

**Before The
Public Service Commission of South Carolina**

Docket No. 2007-4-G

**Annual Review of Purchased Gas Adjustment and
Gas Purchasing Policies of Piedmont Natural Gas Company, Inc.**

**Direct Testimony and Exhibits
Of
Keith P. Maust**

**On Behalf Of
Piedmont Natural Gas Company, Inc.**

RECEIVED
2007 OCT 12 AM 10:06
SC PUBLIC SERVICE
COMMISSION



October 11, 2007

1 **Q. Please state your name and your business address.**

2 A. My name is Keith P. Maust. My business address is 4720 Piedmont Row
3 Drive, Charlotte, North Carolina.

4 **Q. By whom and in what capacity are you employed?**

5 A. I am employed by Piedmont Natural Gas Company, Inc., (Piedmont) as
6 Managing Director, Gas Supply and Scheduling.

7 **Q. Please describe your educational and professional background.**

8 A. I graduated from West Virginia University in 1976 with a Bachelor's
9 Degree in Business Administration. I was employed by Tennessee Gas
10 Pipeline for five years from 1983 to 1988 as an Analyst in the Gas Reserves
11 and Gas Supply departments. I joined Piedmont as a Gas Supply Analyst in
12 July, 1988. I was promoted to Manager of Gas Supply in 1991 and Director
13 of Gas Supply in 1995. In 1996 I was promoted to Director of Gas Supply
14 and Wholesale Marketing. I was promoted to Managing Director, Gas
15 Supply and Scheduling last year.

16 **Q. Please describe the scope of your present responsibilities for Piedmont?**

17 A. My current major responsibilities include supervision of long and short-term
18 purchasing and scheduling of gas supply and gas cost management
19 activities.

20 **Q. Have you previously testified before this Commission or any other
21 regulatory authority?**

22 A. Yes, I have presented testimony in 1997, 1998, 1999, 2000,, 2001, 2002, 2003,
23 2004, 2005 and 2006 and appeared as a witness before this Commission in the
24 matter of the Commission's annual review of Piedmont's Gas Costs and
25 Purchasing Policies (Dockets No.97-007-G, 98-004-G, 99-004-G, 2000-004-G,
26 2001-004-G, 2002-004-G, 2003-004-G, 2004-004-G, 2005-005-G and 2006-4-

1 G) and in the matter of Piedmont's approved hedging policy (Docket No. 2001-
2 410-G). I have also presented testimony and appeared as a witness before the
3 North Carolina Utilities Commission (NCUC) regarding Piedmont's gas
4 purchasing policies and proposed hedging plan and presented testimony before
5 the Tennessee Regulatory Authority (TRA) regarding Nashville Gas
6 Company's Incentive Plan Account.

7 **Q. Please give a general description of Piedmont and its market in South**
8 **Carolina.**

9 A. Piedmont is a local distribution company principally engaged in the purchase,
10 distribution and sale of natural gas to more than 947,500 customers in South
11 Carolina and North Carolina and the metropolitan area of Nashville, Tennessee.
12 Piedmont serves approximately 131,000 customers in the State of South
13 Carolina. During the twelve month period ending March 31, 2007, Piedmont
14 delivered approximately 22,700,000 dts of natural gas to its South Carolina
15 customers.

16 Piedmont provides service to two distinct markets -- the firm market
17 (principally residential, small commercial and small industrial customers) and
18 the interruptible market (principally large commercial and industrial
19 customers). Although Piedmont competes with electricity for the attachment of
20 firm customers, once attached these customers generally have no readily
21 available alternative source of energy and depend on natural gas for their basic
22 space heating or utility needs. During the twelve month period ending March
23 31, 2007, approximately 18,125,000 dts, or 80%, of Piedmont's South Carolina
24 deliveries were to the firm market.

25 In the interruptible market, Piedmont competes on a month-to-month
26 and day-to-day basis with alternative sources of energy, primarily fuel oil or
27 propane and, to a lesser extent, coal or wood. These larger commercial and

1 industrial customers will buy alternate fuels when they are less expensive than
2 gas. During the twelve month period ending March 31, 2007, approximately
3 4,587,000 dts, or 20% of Piedmont's South Carolina deliveries were to the
4 interruptible market.

5 **Q. What is the purpose of your testimony in this proceeding?**

6 A. My testimony will describe Piedmont's gas purchasing policies. This testimony
7 is in response to the Commission's directive issued in Order No. 88-294 dated
8 April 6, 1988 requiring ". . . annual public hearings . . . to review the
9 Company's . . . gas purchasing policies" and in response to the Commission's
10 Order establishing pre-filing deadlines in this docket.

11 **Q. What is the period of review in this docket?**

12 A. The review period is April 1, 2006 through March 31, 2007

13 **Q. Please explain Piedmont's gas purchasing policies.**

14 A. Piedmont has previously utilized and continues to maintain a "best cost" gas
15 purchasing policy. This policy consists of five main components -- the price of
16 the gas, the security of the gas supply, the flexibility of the gas supply, gas
17 deliverability and supplier relations. All of these components are interrelated,
18 and we will continue to weigh the relative importance of each of these factors
19 when developing an overall gas supply portfolio to meet the needs of our
20 customers.

21 **Q. Please describe each of the five components.**

22 A. The "price of the gas" refers to the delivered cost of gas to Piedmont's city
23 gate. In order to properly judge prices at a comparable transaction point,
24 Piedmont evaluates purchase prices at the pipeline city gate points of delivery
25 into Piedmont's distribution facilities. With the unbundling of the interstate
26 pipeline industry, substantial flexibility exists in structuring gas supply
27 arrangements. The majority of Piedmont's supply purchases take place at

1 “pooling points” into the pipeline on which Piedmont holds firm transportation
2 capacity rights. These “pooling point” supply purchases from producers and
3 marketers include the commodity cost of gas at the pooling points and the fuel
4 to be retained by the downstream pipeline transporter. Commodity
5 transportation charges are also assessed separately by pipelines. Any “best
6 cost” analysis that solely considered supply area or “pooling point” cost would
7 fail to recognize the varying cost in fuel and commodity costs associated with
8 transporting gas purchased from different supply area locations to Piedmont’s
9 city gate. In the case of “bundled” city gate supply purchases, Piedmont may
10 pay the gas supplier an all-inclusive price that covers the cost of gas, fuel and
11 transportation charges. Of course, peaking and storage services may add
12 additional injection, withdrawal, and related fuel charges to the city gate cost of
13 gas. All of these cost components must be taken into account in evaluating the
14 “price of the gas.”

15 “Security of gas supply” refers to the assurances that the supply of gas
16 will be available when needed. Obviously, it is important to maintain a high
17 level of supply security for Piedmont’s firm customers who have no alternate
18 fuel capability. Security of gas supply is less important for our interruptible
19 customers who have access to alternate fuels. In order to reserve firm gas
20 supplies under contract, fixed reservation fees are generally required in addition
21 to the commodity cost of gas. In addition, the geographic source of supply, the
22 nature of the supplier’s portfolio of gas supplies (especially during critical
23 conditions) and negotiated contract terms must be considered when evaluating
24 the level of supply security. Thus, the security of gas supply is interrelated with
25 the price of gas and the other components of Piedmont’s “best cost” purchasing
26 policy.

1 “Flexibility of gas supply” refers to our ability to adjust the volume of
2 a particular gas supply as operating and market conditions change from time to
3 time. For example, firm heat sensitive customers will vary their consumption
4 depending on the weather conditions in Piedmont’s service area. Interruptible
5 customers will vary their level of purchase depending on the price of alternate
6 fuels and the demand for product in their own industry. Thus, Piedmont must
7 arrange a portfolio of gas supplies and storage service flexible enough to meet
8 the daily and monthly “swings” in the market place. Contractual gas supply
9 “swing rights” are implemented through periodic renominations with gas
10 suppliers and through injections into and withdrawals from storage.

11 “Gas deliverability” refers to the ability to obtain Piedmont’s gas
12 supplies at the city gate through reliable transportation and storage capacity
13 arrangements. The unbundling of the interstate pipeline industry has created a
14 complex system of multiple pipeline services and service combinations.
15 Transportation arrangements can involve supply area gathering services,
16 intrastate transportation, interstate lateral line and pooling services, multiple
17 interstate pipeline transportation and storage arrangements, and balancing and
18 peaking services. The marketplace for pipeline capacity service is static, with
19 little to no unused capacity available during period of design temperature
20 conditions. Consequently, it is important that we secure and maintain firm
21 transportation and storage capacity rights to ensure the deliverability of our gas
22 supplies to meet the design day, seasonal, and annual needs of our customers.
23 Of course, pipeline capacity contracts require the payment of fixed demand
24 charges to reserve firm transportation or storage entitlements. Piedmont is
25 active in proceedings at the Federal Energy Regulatory Commission (FERC)
26 not only with respect to the level of pipeline charges under these contracts, but
27 also the tariff terms and conditions that apply to these pipeline services.

1 “Supplier relations” refers to the dependability, integrity and
2 flexibility of a particular gas supplier. We contract with gas suppliers who have
3 a reputation of honoring their contractual commitments and have proven
4 themselves as reliable suppliers. Conversely, we avoid suppliers which have a
5 reputation of defaulting on contract obligations or who unilaterally interpret
6 contracts to their advantage. We prefer to deal with suppliers who are
7 constantly looking for ways to improve service and offer “win-win” solutions
8 for meeting customer needs.

9 **Q. Please describe the arrangements under which Piedmont purchases gas.**

10 A. Piedmont purchases gas supplies under a diverse portfolio of contractual
11 arrangements with a number of reputable gas producers and marketers. In
12 general, under Piedmont’s firm gas supply contracts, Piedmont pays negotiated
13 reservation fees for the right to reserve and call on firm supply service up to a
14 maximum daily contract quantity (nominated either on a monthly or daily
15 basis), with market-based commodity prices tied to indices published in
16 industry trade publications. These firm contracts range in term from one year
17 (or less) to terms extending into 2011. Longer term contracts typically provide
18 for periodic reservation fee renegotiations. Some of these contracts are for
19 winter only (peaking or seasonal) service and some provide for 365 day
20 (annual) service. Firm gas supplies are purchased for reliability and security of
21 service and are generally priced on a reservation fee basis according to the
22 amount of nomination flexibility built into the contract (daily swing service
23 being more expensive than monthly baseload service). When existing supply
24 contracts expire, requests for proposals are sent, as needed, to suppliers meeting
25 Piedmont’s “best cost” purchasing policy requirements as detailed earlier in my
26 testimony. Firm supplies are then contracted from suppliers whose proposals
27 best fulfill Piedmont’s “best cost” purchasing policy.

1 Piedmont also purchases gas supplies in the spot market under
2 contract terms of one month or less. These contracts provide for little or no
3 supply security in that they are interruptible and short term in nature. As a
4 result, Piedmont relies on these contracts primarily for interruptible markets
5 during off-peak periods when spot supplies are more abundant and for
6 supplemental system balancing requirements. Because of the nature of spot
7 contracts, these supplies do not command reservation fees and are priced on a
8 commodity basis, generally by reference to industry index or negotiated prices.

9 **Q. How does the interrelationship of the five factors described above**
10 **determine the character of the supply and capacity contracts under your**
11 **“best cost” policy?**

12 A. Under our “best cost” policy, we attempt to secure and maintain a supply
13 portfolio that is in balance with the requirements of our sales markets. Because
14 our firm sales market must have a secure and reliable gas supply, we meet the
15 needs of this market primarily with long-term firm supply and transportation
16 contracts, supplemented by storage and peaking services. The temperature
17 sensitivity of the firm market necessitates that flexibility of supply and storage
18 also be provided. As mentioned earlier, firm supply contracts demand a
19 premium payment, typically in the form of fixed reservation fees. Also, firm
20 supply contracts with flexibility of swing service entitlements will command a
21 higher price than baseload arrangements. Because our interruptible market is
22 more price sensitive and requires less supply security, we supply this market
23 with off-peak firm gas supply and transportation services when the core market
24 demand declines and through the purchase of gas supplies in the spot market.
25 In short, before entering into any agreement to purchase gas or pipeline
26 capacity, we carefully consider the use for the supply and weigh the five “best
27 cost” factors (price, security, deliverability, flexibility, and supplier relations).

1 Obviously, a great deal of judgement is required when weighing these factors.
2 To help us exercise this judgement, we try to keep informed about all aspects of
3 the natural gas industry. We intervene in all major FERC proceedings
4 involving our pipeline transporters, stay in constant contact with our existing
5 and potential suppliers, monitor gas prices on a real-time basis, subscribe to
6 industry literature, follow supply and demand developments, and attend
7 industry seminars.

8 **Q. Please describe the Company's interest and position on any issues before**
9 **the FERC that may have a significant impact on the company's operations**
10 **and a description of the status of each proceeding described.**

11 A. The Company routinely intervenes and participates in interstate natural gas
12 pipeline proceedings before the FERC. A current summary of such
13 proceedings in which Piedmont is a party is attached hereto as Exhibit__
14 (KPM-1)

15 **Q. What is your greatest challenge in applying your "best cost" gas**
16 **purchasing policy?**

17 A. Since most major gas supply decisions require a considerable degree of
18 planning and must be made years in advance of service, our greatest challenge
19 is dealing with future uncertainties in a dynamic national and regional energy
20 market. In a perfect world, we would be able to accurately predict our future
21 demand for gas, the future availability and pricing of gas supplies and capacity,
22 and future regulatory policies. Of course, in the real world, we cannot
23 accurately predict any of these factors. Future demand for gas is affected by
24 economic conditions, customer conservation efforts, weather patterns,
25 regulatory policies and industry restructuring in the energy markets. The future
26 availability and pricing of gas supplies will be affected by overall demand, oil

1 and gas exploration and development, pipeline expansion projects, and
2 regulatory policies and approvals.

3 **Q. Please explain the Company's position regarding the current U.S. supply**
4 **situation.**

5 A. The United States has been struggling to avoid a gradual decline in natural gas
6 production despite increases in drilling rig activity for the last few years,
7 particularly in the gulf coast region. The gulf coast is a mature production
8 basin, meaning the region has been extensively drilled by production companies
9 for several decades. Therefore, all the "low hanging fruit," or easily found
10 supply, has already been or is currently being produced. Although this region
11 will continue to be an important part of the country's natural gas supply
12 portfolio, additional supplies from other areas will have to supplement
13 declining gulf coast production for supplies to remain adequate and reasonably
14 priced. Increases of supply from other sources including Rocky Mountain
15 production and LNG imports have partially offset decreases in gulf coast
16 production, but production from areas that are currently off-limits to drilling
17 such as coastal waters and the development of pipeline facilities from regions
18 like Alaska may be necessary for natural gas supplies to remain sufficient and
19 competitively priced with alternate fuel choices.

20 **Q. Has the increase in oil prices affected the price of natural gas?**

21 A. Yes. Oil prices have remained high due to increases in global demand and
22 political instability in many of the large producing regions of the world. The
23 majority of our interruptible industrial load have the ability to utilize fuel oil as
24 an alternative to natural gas. Because the cost of alternative fuel oil has
25 remained high, most of our dual fuel industrial customers continue to choose
26 natural gas as their fuel of choice, creating upward pressure on the cost of
27 natural gas.

1 **Q. Has electric generation fueled by natural gas affected the price of natural**
2 **gas?**

3 A. Yes. Hotter than normal weather and the resulting increase in electrical
4 demand supplied by natural gas fueled generation contributes to increased
5 volatility and pricing of natural gas. As additional electric generation facilities
6 fueled by natural gas continue to be built, it is only logical to assume that
7 natural gas prices will be affected by the corresponding increased consumption
8 of natural gas.

9 **Q. What process does Piedmont undertake to acquire firm capacity and**
10 **supply to meet its growing market requirements?**

11 A. Piedmont secures incremental capacity and supply to meet the growth
12 requirements of its firm customers consistent with its “best cost” policy. To
13 implement this policy, Piedmont attempts to contract for timely and cost
14 effective supply and capacity. To acquire long-term expansion project capacity
15 precisely in balance with our market growth profile is impossible due to many
16 external factors beyond our control. The lengthy process of pipeline project
17 development and marketing, environmental review, regulatory lag and
18 construction lead-time, requires that major pipeline expansion projects be
19 planned many years ahead of the target “in service” date. Unexpected events
20 during this process can cause delay and uncertainty. To fill the gap between the
21 in service dates of new expansion projects and to meet the requirements of our
22 growing market demand, Piedmont may contract for temporary “bridge”
23 services from various sources of supply and capacity.

24 **Q. How does Piedmont calculate its customer growth?**

25 A. Piedmont reviews historical gross customer additions, holds discussions with
26 various business leaders/trade allies and field sales employees, and considers

1 forecasts of local, regional and national business drivers (i.e., economic conditions,
2 demographic, etc.) to derive its customer growth projections.

3 **Q. How does the Company calculate Design Day requirements for the future?**

4 A. The Design Day calculation involves several elements: the actual throughput
5 and degree days experienced on a recent day (January 23, 2003) that most
6 closely approaches the current design day temperature, the day's interruptible
7 sales, the dekatherm per degree day factor ("DTh/DD") generated from the
8 forecast software program "GASDAY" used by Piedmont, and the forecasted
9 number of heat sensitive customers expected during the upcoming heating
10 seasons. We took the actual sales of January 23, 2003 and subtracted the
11 interruptible sales to produce the firm sales for the day. Since the temperature
12 for the day was higher than the design day temperature, we took the additional
13 number of dekatherms used per degree day as calculated by "GASDAY" and
14 multiplied this factor by the additional number of degree days required to reach
15 design day. We then added the result to the actual firm sales for the day to
16 calculate a projected design day. We took this projected number and broke it
17 into residential, commercial, and industrial sales for the day. We have the
18 actual firm industrial sales for the day and the remainder is the residential and
19 commercial sales combined. Piedmont does not have daily readings for
20 residential and commercial customers. We calculated this number by taking the
21 monthly sales for residential and commercial customers and projected design
22 day usage for each of these classes. We then added a five percent reserve
23 margin to the total firm sales.

24 Each subsequent yearly design day forecast is derived by increasing
25 the temperature sensitive rate classes' usage by multiplying the previous year's
26 projected usage by the next year's forecasted growth percentage. Firm

1 industrial usage was held constant with what was experienced during the
2 2006/07 winter season, as this category is not expected to grow.

3 **Q. Has the Company witnessed any normalized reduction in usage per**
4 **customer as a result of conservation measures, and if so, has the Company**
5 **included the results of conservation measures in its forecasting?**

6 A. Yes, the Company has experienced a reduction in weather normalized usage per
7 customer and we do factor it into our forecast. The increased efficiency of new
8 appliances used by new customers or the replacement of old equipment by
9 existing customers can partially explain the reduction. During the past few
10 years the Company, popular press and the general public discussion has
11 informed the public about commodity prices and ways to use less energy. We
12 believe there has also been a resulting reduction in usage from conservation
13 measures employed by customers directly resulting from increased prices and
14 their awareness of such increased prices. However, Piedmont and the natural
15 gas industry have not seen evidence that conservation/reduced usage occur
16 during design day conditions. The Company has not experienced weather
17 approaching design day temperatures since January of 2003. Without
18 possessing actual system data confirming decreased usage during design day
19 conditions, the Company believes that the effects of conservation measures
20 most likely disappear as you approach design day conditions. Therefore, the
21 Company will continue to utilize a "safe versus sorry" conservative approach to
22 design day forecasting until more and comprehensive data is available.

23 **Q. What were the design day peak demand requirements used by the**
24 **Company for planning purposes for the review period as well as the**
25 **current forecasted design day demand requirements for the next four**
26 **winter seasons, the amount of heating degree days, dekatherms per heating**

1 **degree day, customer growth rates and supporting calculations used to**
2 **determine the peak day requirement amounts?**

3 A. Please see Exhibit__(KPM-2)

4 **Q. Do the design day demand requirement amounts provided above reflect**
5 **any demand from markets other than firm?**

6 A. The design day demand requirement amounts provided above include only the
7 firm market requirements.

8 **Q. What were the estimated base load demand requirements of the firm**
9 **market for the review period, as well as the current forecasted base load**
10 **demand requirements for the next four years?**

11 A. Please see Exhibit__ (KPM-3)

12 **Q. Please describe how Piedmont determines which type of resource should be**
13 **acquired or developed for meeting the Company's forecasted deliverability**
14 **needs and describe the factors evaluated in deciding whether the Company**
15 **should acquire pipeline transportation capacity, acquire a storage service,**
16 **or develop additional on-system storage deliverability.**

17 A. In assessing the type of resources needed to meet Piedmont's deliverability
18 needs, the Company attempts to minimize the per unit delivered gas cost. This
19 analysis incorporates the commodity cost of gas and any transportation, storage
20 costs and supplier reservation fees required to deliver gas to Piedmont's city
21 gate, as well as the reliability and timing of new services. This generally
22 results, to the extent possible, in a correlation of the duration of incremental
23 demand with the days of service of the acquired resource, i.e. acquiring peaking
24 services to meet projected peak day demand, storage to meet projected seasonal
25 demand, and year round pipeline capacity to meet projected baseload demand.
26 Piedmont also considers the possibility of changes in demand due to exogenous
27 factors, such as changes in residential market demand (new housing starts) and

1 changes in industrial market demand (energy prices and worldwide economic
2 conditions).

3 **Q. How does the Company determine the amount of incremental pipeline**
4 **capacity that should be acquired for a whole year, the full winter season**
5 **and less than the full winter season?**

6 A. Piedmont evaluates interstate pipeline capacity offerings available at the time
7 that it is determined that additional future firm delivery service is required. The
8 company attempts to match the days of service of new incremental
9 transportation capacity to the duration of its incremental demand on the most
10 economical basis possible, with offerings evaluated on an equivalent unit basis.
11 As explained earlier, Piedmont attempts to acquire peaking services to meet
12 projected peak day demand, storage to meet projected seasonal demand, and
13 year round pipeline capacity to meet projected baseload demand and provide
14 gas supplies for replenishment of storage inventories. However, service
15 choices are generally limited to those offered during the period of evaluation.
16 Moreover, swing supply contracting can sometimes complement transportation
17 service and provide a competitive surrogate peaking service.

18 **Q. Please describe the factors the Company evaluates in determining the**
19 **characteristics of its storage service contracts, including the amount of gas**
20 **that can be withdrawn and delivered on a peak day, the amount of gas that**
21 **can be withdrawn and delivered during the winter season and the period**
22 **during which the gas can be withdrawn.**

23 A. Once a determination is made that a storage service is needed as described
24 earlier, Piedmont's needs with respect to deliverability to and from storage are
25 matched against available storage options as closely as possible. Storage
26 service characteristics and limitations including the amount of gas that can be
27 withdrawn and delivered on a design day, the amount of gas that can be

1 withdrawn and delivered during the winter season and the period during which
2 gas can be withdrawn are defined within the corresponding pipeline's tariffs
3 that govern each particular storage service. Piedmont also evaluates other
4 elements and limitations, such as refill ability, swing service options and
5 storage ratchets that are also governed by the tariffs for each storage contract
6 into its daily gas control operations.

7 **Q. Please describe how the Company plans to supply its estimated future**
8 **growth requirements during the next four-year period beginning with the**
9 **2007-2008 winter season.**

10 A. Piedmont continually monitors interstate pipeline and storage capacity offerings
11 in light of prospective growth requirements detailed in Exhibit__(KPM-2). The
12 Company will add additional capacity utilizing its "best cost" purchasing
13 philosophy as its firm market supply requirements dictate.

14 **Q. How does the Company plan to have adequate supplies available for its**
15 **firm market supply requirements if it experiences normal or design day**
16 **weather conditions?**

17 A. The Company constructs load duration curves that forecast the Company's firm
18 market supply requirements for normal weather conditions, design day weather
19 conditions and design winter season conditions. The supply requirements are
20 plotted in descending order of magnitude, with existing pipeline capacity and
21 storage resources overlaid to expose any supply shortfalls. The load duration
22 curves for 2006-2007 forecasted design winter season described above, as well
23 as the actual 2006-2007 winter season load duration curve is shown in
24 Exhibit__(KPM-4). The forecasted load duration curves for the 2007-2008
25 winter season are shown in Exhibit__(KPM-5).

1 **Q. Does the Company plan for any reserve margin to accommodate statistical**
2 **anomalies, unanticipated supply or capacity interruption, force majeure,**
3 **emergency gas usage or colder-than-design weather?**

4 A. Yes, the Company computes a five percent reserve margin and arranges for
5 supply and/or capacity to provide delivery of the reserve margin for events such
6 as those listed above. This reserve margin is reflected in Exhibit__(KPM-2).

7 **Q. Please describe how the Company determines the daily contract quantity**
8 **of gas supplies that should be acquired through long-term contracts for the**
9 **whole year, the full winter season and periods less than a full winter**
10 **season.**

11 A. The Company prepares studies using load duration curves as mentioned earlier
12 to model its firm supply requirements for an annual period, taking into
13 consideration critical winter scenarios. Consideration is also given to situations
14 that are less than critical to assure low load supply flexibility. The Company
15 also utilizes a software package called "Gas Day" to assist in its daily
16 forecasting requirements. The Company will purchase gas supplies on a year
17 around basis to fulfill its firm requirements including storage injections and to
18 minimize supply costs utilized to serve both firm and interruptible markets.
19 Some of these contracts will escalate in volume during shoulder months and the
20 winter period (November through March) as the Company's firm requirements
21 increase due to colder weather, thus sculpting year around contracts to fit
22 seasonal needs. The Company also purchases volumes for the winter period to
23 match its firm transportation capacity entitlements, which also increase during
24 the winter period. Lastly the Company may purchase short-term city gate
25 peaking supply to fulfill additional firm obligations as the company experiences
26 peak day firm demand requirements. The company reviews warm winter

1 weather scenarios to measure its ability to fulfill its contractual purchase
2 commitments with suppliers.

3 **Q. Please explain the factors that the Company evaluates in determining the**
4 **pricing basis for its gas supply contracts. Please discuss the various pricing**
5 **alternatives available, such as fixed prices, monthly market indexing and**
6 **daily spot market pricing and describe how supplier reservation charges**
7 **and discounts or premiums from market prices enter into the evaluation.**

8 A. The Company has various pricing options available to it when developing its
9 gas supply portfolio. These options include fixed pricing, monthly market
10 indexing and daily spot pricing. Fixed pricing scenarios are addressed in the
11 Company's hedging plan, which has been approved by the Commission. The
12 reservation fee the Company pays for each contract in its firm supply portfolio
13 is dependent upon the pricing options chosen and the supply flexibility
14 requirements associated with each contract. Reservation fees are generally
15 lower for base load supplies (purchased at a constant volume for the entire
16 month) and higher if swing service is required. Reservation fees vary
17 depending on the type of swing service being provided. Examples of factors
18 which affect the cost of swing service are: a) the number of days of swing
19 required; b) the volume of swing allowed; c) commodity pricing at first of the
20 month indices versus daily spot pricing; d) first of the month keep whole
21 pricing; e) intraday versus interday swing capabilities; and f) location of the
22 supply being purchased. The Company considers its anticipated load factor and
23 swing requirements under various weather scenarios, measuring the exposure to
24 price fluctuations of the spot market and the factors listed above and makes a
25 "best cost" purchasing decision.

26 **Q. Please explain the provisions in the Company's gas supply contracts that**
27 **allow or help facilitate future renegotiation efforts if future market**

1 **conditions offer new opportunities and describe any contractual restraints**
2 **that prevented the Company from obtaining full benefit of favorable spot**
3 **market conditions during the review period.**

4 A. All of the Company's supply contracts have market-based commodity prices
5 tied to indices published in industry trade publications. These commodity
6 pricing provisions allow the Company to obtain the full benefit of market
7 priced gas.

8 **Q. What process does the Company employ in selecting its firm gas suppliers.**

9 A. The Company identifies the volume and type of supply that it needs to fulfill its
10 market requirements and solicits requests for proposals (RFP's) from a list of
11 suppliers that the gas supply department continuously updates as potential
12 suppliers enter and leave the market place. As mentioned earlier, type of
13 supply is classified as baseload or swing and firm or interruptible. Requests for
14 proposals for swing supply may be further categorized into pricing based on
15 first of the month indices, keep whole, or daily market indices. Swing supplies
16 priced at first of the month indices command the highest reservation fees
17 because suppliers incur all the risk associated with market volatility during the
18 delivery period. Keep whole contracts require the Company to reimburse
19 suppliers for the difference between first of the month index prices and lower
20 daily market prices if the Company doesn't take its full contractual volume.
21 Because the Company assumes the volatility risk associated with falling prices,
22 a lower reservation fee is warranted. Lower reservation fees are also associated
23 with swing contracts based upon daily market conditions because both buyer
24 and seller assume the risk of daily market volatility. After forecasting the load
25 factor of each individual contract and evaluating the cost of reservation fees
26 associated with each type of supply and its corresponding bid, the Company

1 makes a “best cost” decision on which type of supply and supplier to fulfill its
2 needs.

3 **Q. Please summarize any supply arrangements entered into by the Company**
4 **during the review period.**

5 A. During the review period the Company added new seasonal or year around
6 supply utilizing its normal RFP process described earlier.

7 **Q. Please describe the process that Piedmont utilized and the market**
8 **intelligence evaluated during the review period to determine the prices**
9 **charged for off-system sales.**

10 A. The process and information used by Piedmont in pricing off-system sales
11 depends upon the term of the sale, the type of sale and prevailing market
12 conditions at the time of the sale. For long-term delivered sales (longer than
13 one month), Piedmont solicits bids from potential buyers and awards volumes
14 based on the bids received. For short-term transactions (daily or monthly)
15 Piedmont will monitor prices and volumes on Intercontinental Exchange
16 (Intercontinental Exchange or “ICE” is an electronic trading platform where
17 potential buyers post bids and potential sellers post offers at various physical
18 locations), talk to various market participants on the telephone and for less
19 liquid trading points, estimate prices based on price relationships with more
20 liquid points. The Company will also evaluate the amount of supply available
21 for sale and weigh that against current market conditions in formulating its
22 sales strategy (i.e., if Piedmont has a large amount of supply to sell on a
23 particular day and determines that market demand is low, the Company will be
24 more aggressive in its sales strategy. The Company incorporates all these
25 factors and then initiates sales via “ICE” or over the telephone.

26 **Q. Did Piedmont make any changes in its gas purchasing policies or practices**
27 **during the period of review?**

1 A. Piedmont did not implement any changes in its “best cost” gas purchasing
2 policies or practices during the test period.

3 **Q. Did Piedmont’s Hedging Plan work properly during the review period?**

4 A. Yes. The Hedging Plan accomplished its goal of providing an additional tool to
5 reduce gas cost volatility to customers in South Carolina that purchase gas from
6 Piedmont.

7 **Q. What were the net economic results of the Hedging Plan during the review**
8 **period?**

9 A. Piedmont’s South Carolina customers incurred a net economic cost of
10 \$4,703,740 as a result of Piedmont’s hedging plan during the review period.
11 This net economic impact includes expenses incurred in administering the
12 program including commissions, software, subscriptions and data feed.

13 **Q. Please describe how compliance with the Hedging Plan is monitored.**

14 A. Currently, the Gas Accounting, Finance, and Corporate Compliance areas
15 perform ongoing activities to monitor compliance with the Plan. In addition, on
16 a bi-monthly basis the Energy Risk Management Committee (ERMC) monitors
17 compliance to the Plan. Periodic internal audits have and will be performed to
18 ensure controls continue to be adequate and function as management intends.

19 **Q. Have there been any deviations from the Hedging Plan during the review**
20 **period?**

21 A. There were no deviations from the plan during the review period.

22 **Q. Did the Company take any other actions to reduce price volatility for its**
23 **customers?**

24 A. The Company utilized storage as a physical hedge to stabilize cost. The
25 Company’s Equal Payment Plan and use of the PGA benchmark price and
26 deferred cost accounting allowed for a smoothing effect on gas price volatility.

1 **Q. What are some of the other steps Piedmont has taken to manage its gas**
2 **costs consistent with its “best cost” policy during the review period?**

3 A. During the past year, Piedmont has taken the following additional steps to
4 manage its gas costs, consistent with its “best cost” policy:

5 (1) As previously discussed, Piedmont has actively participated in
6 proceedings before the FERC and other regulatory agencies that could
7 reasonably be expected to affect Piedmont’s rates and services;

8 (2) Piedmont has utilized the flexibility available within its supply
9 and capacity contracts to purchase and dispatch gas, release capacity and
10 initiate secondary marketing sales in the most cost effective manner, resulting
11 in South Carolina capacity release and secondary market sales credits of
12 \$5,720,250, an increase of \$1,708,515 over the prior year;

13 (3) Piedmont has actively promoted more efficient peak day use of
14 natural gas and load growth from “year-around” markets in order to improve
15 the Company’s load factor and reduce average unit costs; and

16 (4) Piedmont has reviewed its gas supply activities with its Energy
17 Risk Management Committee, comprised of senior management and employees
18 from other functional areas within the Company, in order for the gas supply
19 department to receive input and direction on its performance and planning
20 activities.

21 **Q. Please summarize your testimony.**

22 A. Piedmont’s “best cost” purchasing policy provides the Company with a secure,
23 reasonably priced supply of gas to meet the requirements of its customers. This
24 policy and the Company’s practice under this policy have been reviewed and
25 found prudent on all occasions in South Carolina and the other state
26 jurisdictions in which we operate. Although we believe our policies and
27 procedures are reasonable, we are cognizant of the fact that the natural gas

1 industry is rapidly changing, and we are constantly monitoring our policies and
2 procedures to keep up with, and even anticipate, these changing conditions. We
3 have and will continue to meet with the Commission Staff to review current
4 regulations and tariffs and explore possible changes that will better serve
5 natural gas consumers in the future. We are satisfied that our existing policies
6 and procedures are prudent and that they have produced and will continue to
7 produce adequate amounts of reasonably priced gas for our customers.

8 **Q. Does this conclude your testimony?**

9 A. Yes.

10

EXHIBIT__(KPM-1)

Piedmont's Filing Activity

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
CP06-421-000	Transcontinental Gas Pipe Line	8/1/2006	neutral intervention	Application for a Certificate of Public Convenience and Necessity authorizing an incremental expansion of Transco's existing pipeline system ("Potomac Expansion Project") that will provide an additional 165,000 dekatherms per day of firm transportation capacity in Transco's Mid-Atlantic market area. Transco states that the estimated cost of the Potomac Expansion Project facilities will be \$73.7 million.
CP06-430-000	Columbia Gas Transmission	8/28/2006	Motion to Intervene and Comments - Piedmont has concern that Columbia's proposal may have negative operational and cost implications to Columbia's firm storage service customers, and that Columbia's abbreviated application and request for shortened procedure in this docket prevents these issues of concern from being fully explored and evaluated. Furthermore, Columbia should bear the risk for any adverse effects on firm customer storage entitlements that may result from their proposal, particularly since it appears that Columbia is positioning itself with this application to sell interruptible service without providing any interruptible service revenue crediting to its firm customers.	Filing of an application pursuant to Section 7(c) of the Natural Gas Act, as amended, and Part 157 of Commission's regulations for a Certificate of Public Convenience and Necessity authorizing Columbia to increase the maximum volume of gas in storage in certain storage fields, on a temporary basis from August 2006 to April 2007, to a level above the amount currently certificated by the Commission for those storage fields. Columbia also requests that the Commission grant such approval by August 31, 2006.
CP07-31-000	Dominion Transmission	1/3/2007	Filed intervention.	On 12/8/2006, Dominion Transmission Inc. ("DTI") filed an application pursuant to section 7 of the Natural Gas Act, seeking authority to construct, install, own, operate, and maintain certain facilities located in Virginia, Maryland, West Virginia, Pennsylvania, and New York that comprise the USA Storage Project.
RP00-469-000	East Tennessee Gas Transmission	7/31/2006	neutral intervention	Pursuant to the Commission's 11/4/2004 Order, East Tennessee submits for filing its Segmentation Report. The report concludes that, at this time, East Tennessee cannot implement system-wide segmentation.
RP01-245-000	Transcontinental Gas Pipe Line	7/25/2006	Motion to intervene in Con Ed v. FERC Petition For Review in US Federal District Court	Base Rate proceeding

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
RP01-245-000	Transcontinental Gas Pipe Line	10/16/2006	Initial Comments in Support of the Stipulation and Agreement	Base Rate proceeding
RP04-98-002	Columbia Gulf Transmission	1/17/2007	Filed intervention	Filed tariff sheets proposing to adopt a 15 degree F cricondenthem HDP (CHDP), in compliance with FERC's 8/1/2006 order. The proceeding is the result of the Indicated Shippers filing a complaint against Columbia Gulf on 12/3/2003, alleging that Gulf failed to comply with Section 4 of the NGA by posting Critical Notices on its website to establish a maximum acceptable BTU limit for gas receipts into its system.
RP04-99-000	Tennessee Gas Pipeline	3/19/2007	Piedmont with Atmos filed a joint protest to 02/26/2007 HDP settlement proposal; First, the proposed cricondotherm hydrocarbon dew point ("HDP") provisions set forth in the Offer of Settlement represent a significant increase in the ability of producers to bring "wet" gas onto the Tennessee system compared to what has been historically delivered to LDCs and end-users receiving service from Tennessee. ² Second, Tennessee's Offer of Settlement provides no protection to LDCs or endusers that will receive this "wet" gas from Tennessee at interconnect points where, due to the historic configuration of delivery facilities, the delivered pressure of gas remains much higher than the operating pressures used by such LDCs and end-users. Third, even if Tennessee's proposed HDP standard was appropriate, which it is not, the flexible nature of the HDP limitations as well as the "wait and see" approach incorporated into the related tariff provisions is not appropriate.	Indicated Shippers Filing of a Complaint for Fast-Track Processing against TGP. (Indicated Shippers is comprised of BP, ChevronTexaco, ConocoPhillips, ExxonMobil, and Shell.) The Indicated Shippers allege that TGP has violated Section 4 of the Natural Gas Act by imposing on shippers, producers, and interconnecting pipelines a hydrocarbon dew point limit ("HDP Limit") on gas entering its system through Critical Notice postings on its website as a means of avoiding the statutory and regulatory requirements for implementing tariff changes. The Indicated Shippers request that the Commission require TGP to cease and desist from this practice and propose a tariff change through a Section 4 filing if it wants to revise its quality specifications.
RP06-289-000		4/5/2006	neutral intervention	Filing to include in its FERC Gas Tariff a mechanism to address to contract extension rights for contracts that rely on off-system capacity that is acquired by TGP where TGP does not have the unilateral right to extend its contract for such off-system capacity at the end of the contract term. Proposed effective date of May 1, 2006.
RP06-292-000	Pine Needle LNG	4/6/2006	neutral intervention	Electric Power and Fuel Rate Tracker, effective May 1, 2006.

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
RP06-297-000	Tennessee Gas Pipeline	4/26/2006	neutral intervention	Petition for Declaratory Order under Rule 207 (a)(2) of the Commission's Regulations (18 C.F.R. §385.207(a)(2)) requesting that the Commission find that: (1) Columbia Gulf Transmission Company ("Columbia Gulf") is violating the Commission's orders in RP04-215-000 by refusing to allow the installation of two taps necessary for the Commission-directed interconnection on the Blue Water Project ; (2) Columbia Gulf must permit the taps to be installed and in service no later than ten days after the upstream facilities have been constructed by TGP; and (3) that Columbia Gulf's compliance with (1) and (2), is not conditioned by any other requirements.
RP06-316-000	Dominion Transmission	5/4/2006	neutral intervention	Filing to revise its tariff in order to clarify the liability for any loss of gas in storage and customers' responsibility to insure gas that they own. Proposed effective date of May 22, 2006.
RP06-317-000	Transcontinental Gas Pipe Line	5/4/2006	neutral intervention	Filing to add Section 31, "Waiver" to the General Terms and Conditions of its tariff. Transco states that the proposed Section 31 allows Transco to waive its rights and shippers' obligations under Transco's tariff on a not unduly discriminatory basis. Proposed effective date of 5/24/2006.

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
RP06-336-000	Pine Needle LNG	5/10/2006	Motion to Intervene and Protest - Piedmont finds that the proposed increase in depreciation rates for storage, transmission and intangible plant (from 2.5% to 4.5%, 3.63% and 4.03%, respectively), as well as the introduction of negative salvage rates for the storage and transmission facilities, appear neither just nor reasonable. Pine Needle's proposed depreciation rates are significantly different from the current depreciation rate of 2.5%, which the Commission found to be just and reasonable in both CP96-52 and RP02-407. At a minimum, Piedmont submits that greater examination of each of these issues is merited in this case. Therefore, Piedmont requests that the Commission suspend the effectiveness of Pine Needle's filing for the full five-month period permitted by the Natural Gas Act, and set this proceeding for a full evidentiary hearing.	NGA Section 4 Base Rate Filing Pursuant to Article IV of the Stipulation and Agreement under RP02-407. Proposed cost of service increase of \$2,467,522 (from \$18,250,000 underlying Pine Needle's current rates to \$20,717,522). Principal factors: an increase in rate of return (proposing an overall rate of return of 11.01 percent, with an equity rate of return of 13.60 percent) and related taxes, an increase in depreciation expense and the establishment of negative salvage rates. The proposed effective date for the rates is June 1, 2006.
		12/27/2006	Filed comments in support of settlement.	NGA Section 4 Base Rate Filing Pursuant to Article IV of the Stipulation and Agreement under RP02-407. Proposed cost of service increase of \$2,467,522 (from \$18,250,000 underlying Pine Needle's current rates to \$20,717,522). Principal factors: an increase in rate of return (proposing an overall rate of return of 11.01 percent, with an equity rate of return of 13.60 percent) and related taxes, an increase in depreciation expense and the establishment of negative salvage rates. The proposed effective date for the rates is June 1, 2006.
RP06-356-000	Transcontinental Gas Pipe Line	5/17/2006	neutral intervention	Filing to revise Transco's Form of Service Agreement under Rate Schedule FT by inserting alternative language in Article IV that will allow the contract effective date to be determined by the later of the anticipated in-service date of a project or the date that all of the project facilities necessary to provide firm transportation service have been constructed and are ready for service. proposed effective date of June 9, 2006.

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
RP06-365-000	Columbia Gas Transmission	6/6/2006	neutral intervention	Filing to incorporate into its FERC Gas Tariff certain gas quality specifications that Columbia Gas has used in its meter set agreements for receipt interconnects on its pipeline system since 1996
		12/22/2006	Refer to Docket RP06-231 for information on gas quality.	Filing to incorporate into its FERC Gas Tariff certain gas quality specifications that Columbia Gas has used in its meter set agreements for receipt interconnects on its pipeline system since 1996.
RP06-391-000	Tennessee Gas Pipeline	7/11/2006	Motion to intervene out of time	USGen New England, Inc. ("USGen"), filed a petition for a declaratory order pursuant to Rule 207 of the Commission's Rules and Regulations (18 C.F.R. § 385.207) declaring that (1) USGen is not contractually precluded from filing a Section 5 complaint against Tennessee Gas Pipeline Company ("TGP") challenging the reasonableness of its rates and fuel charges; and (2) TGP's tariff does not address the calculation of damages or mitigation of damages arising from a breach by a shipper, and state law consequently governs the determination of the mitigation of damages in the event of a breach.
RP06-406-000	Texas Eastern Transmission	7/3/2006	neutral intervention	Filing of semi-annual Electric Power Cost Adjustment to be effective August 1, 2006.
RP06-425-000	Transcontinental Gas Pipe Line	7/10/2006	neutral intervention	Filing of a Report of Refund detailing PAL and ICTS revenue sharing refunds paid on June 21, 2006
RP06-457-000		8/10/2006	neutral intervention	Filing to cancel of Rate Schedule FT-NT effective July 1, 2006
RP06-465-000	Texas Eastern Transmission	8/10/2006	neutral intervention	Texas Eastern, East Tennessee et al. filed for temporary waiver of certain tariff provisions, NAESB standards and FERC regulations due to LINK® system outages associated with the upcoming conversion of LINK® from the current mainframe platform to a client-server platform.
RP06-474-000	Dominion Transmission	8/16/2006	neutral intervention	Filing to decrease the ACA surcharge from \$0.0018/dt or \$0.0016/dt, effective 10/1/2006
RP06-487-000	Pine Needle LNG	8/18/2006	neutral intervention	Filing to decrease the ACA Charge in the commodity portion of Pine Needle's rates, from \$0.0018/dt to \$0.0016/dt, effective October 1, 2006.

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
RP06-488-000	Transcontinental Gas Pipe Line	8/18/2006	neutral intervention	Filing to decrease the ACA Charge in the commodity portion of Transco's rates, from \$0.0018/dt to \$0.0016/dt, effective October 1, 2006.
RP06-509-000	Texas Eastern Transmission	8/31/2006	neutral intervention	Filing to modify various sections of its tariff and to delete all reference to the Gas Research Institute surcharges, effective September 24, 2006
RP06-515-000	East Tennessee Gas Transmission	8/31/2006	neutral intervention	Filing to modify various sections of its tariff and to delete all reference to the Gas Research Institute surcharges, effective September 25, 2006.
RP06-569-000	Transcontinental Gas Pipe Line	9/12/2006	Motion to Intervene & Protest	Filing of Section 4 General Rate Increase - Transco states that the proposed cost of service in this filing is \$1,131,526,068, compared to a cost of service of \$717,154,080 underlying Transco's current rates which the Commission found just and reasonable in Docket No. RP01-245. Transco states that the increase in cost of service is due to a number of factors including an increase in operation and maintenance expenses, an increase in depreciation rates, an increase in the rate base, and an increase in the rate of return.
RP06-588-000	Texas Eastern Transmission	9/13/2006	neutral intervention	Filing of report on recalculation of Operational Segement Capacity Entitlements effective November 1, 2006.
RP06-596-000	Columbia Gulf Transmission	9/29/2006	neutral intervention	Filing to incorporate new credit policies into the existing General Terms and Conditions of its Tariff, with a proposed effective date of October 19, 2006.
RP07-107-000	Columbia Gas Transmission	12/21/2006	Filed intervention	On 12/12/2006, Pepco Energy Services, Inc.(Pepco) filed a formal complaint against Columbia Gas Transmission Corporation pursuant to sections 4 and 5 of the Natural Gas Act, alleging that Columbia's capacity auction held on November 8, 2006, was unjust and unreasonable and unduly discriminatory against Pepco. Pepco states that there were serious flaws in Columbia's Navigator system during the auction.
RP07-125-000	Columbia Gulf Transmission	1/8/2007	Submitted a"plain vanilla" intervention.	On 12/29/2006, Columbia Gulf filed proposed tariff sheets which established procedures for Columbia Gulf to perform operational sales and purchases of natural gas.

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
RP07-147-000	Transcontinental Gas Pipe Line	2/5/2007	Motion to intervene	Transco filed to extend the predetermined allocation deadline stated in Section 18.1 of the GT&C of its tariff and to clarify the language contained in Section 28.1 of the GT&C related to the handling of nominations received after the Intraday Nomination Cycle. Transco proposes to allow receipt and delivery point operators to submit their PDAs to the pipeline at 10:30 am the day following gas flow instead of 8:00 pm CCT on the day of gas flow. Transco also proposed to revise the tariff language in order to correct an imprecise description of its "reasonable efforts" accommodation of nominations received after ID2 Nomination Cycle. Transco proposes to delete the word intraday.
RP07-151-000	Tennessee Gas Pipeline	2/9/2007	Motion to intervene	TGP filed as part of its FERC Gas Tariff, Fifth Revised Volume No. 1, certain tariff sheets proposed to become effective March 1, 2007. TGP states that the purpose of this filing is to revise the off-system capacity provision of its FERC Gas Tariff to allow TGP to use off-system capacity at a specific shipper's behest for service to that shipper, provided the shipper is willing to pay an additional amount not to exceed the charges TGP is obligated to pay the third party for the off-system capacity to be used for the benefit of the shipper.
RP07-171-000	Columbia Gas Transmission	2/27/2007	Motion to intervene	On February 15, 2007, Columbia submitted a revision of the General Terms and Conditions of its Tariff to close a loophole that currently exists with respect to inventory transfers involving rate schedule SIT to become effective March 17, 2007.
RP07-172-000	Columbia Gulf Transmission	2/27/2007	Motion to intervene	On February 15, 2007, Columbia Gulf submitted revised tariff sheets to make available for future sale capacity that is (1) currently unsubscribed, (2) under expiring or terminating service agreements which do not have a right of first refusal or for which a shipper does not exercise its right of first refusal; or (3) available due to modification, construction and/or acquisition of facilities to become effective March 17, 2007.

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
RP07-174-000	Columbia Gulf Transmission	2/28/2007	Motion to intervene and protest. PNG protested GC proposal to implement daily scheduling penalties on its system and requested that the proposed penalty structure be summarily rejected by FERC on the grounds that it is not supported by evidence establishing the operational need for such penalties and because it is otherwise unduly discriminatory, unjust and unreasonable. In the alternative, PNG requested that CG's daily scheduling penalty proposal be suspended for the maximum period permitted and set for hearing.	On February 16, 2007, Columbia Gulf tendered for filing as part of its FERC Gas Tariff, Second Revised Volume No. 1, certain tariff sheets with a proposed effective date of June 1, 2007. According to Columbia, it proposes to implement a new daily scheduling penalty and monthly imbalance resolution process in conjunction with the launch of its new EBB system.
RP07-178-000	Transcontinental Gas Pipe Line	3/5/2007	Motion to intervene	On February 20, 2007, Transco tendered for filing, tariff sheets for the purpose of adding Section 55, "Reservation of Capacity" to the General Terms and Conditions of its tariff. Transco states that the proposed Section 55 sets forth the conditions under which it may enter into a service agreement to start at a specific date up to three years in the future and the conditions under which it may reserve capacity for an upcoming pipeline expansion project.
RP07-328-000		3/9/2007	Motion to intervene	Transco filed to implement its redetermined fuel retention percentages applicable to transportation and storage rate schedules, to be effective 4/1/2007.
		3/16/2007	Motion to intervene out of time.	Transco filed to implement its redetermined fuel retention percentages applicable to transportation and storage rate schedules, to be effective 4/1/2007.
RP07-334-000	Columbia Gas Transmission	3/9/2007	Motion to Intervene	On March 1, 2007, Columbia Gas Transmission Corporation ("Columbia Gas") submitted revised tariff sheets to update their Electric Power Costs Adjustment charge to become effective April 1, 2007.
RP07-335-000		3/9/2007	Motion to Intervene	On March 1, 2007, Columbia Gas Transmission Corporation ("Columbia Gas") submitted revised tariff sheets to update their Retainage Adjustment Mechanism to become effective April 1, 2007.
RP07-336-000		3/9/2007	Motion to Intervene	On March 1, 2007, Columbia Gas Transmission Corporation ("Columbia Gas") submitted revised tariff sheets to update their Transportation Costs Rate Adjustment rates to become effective April 1, 2007.

<i>Docket Number</i>	<i>Pipeline</i>	<i>Activity Date</i>	<i>Filing Statement</i>	<i>Docket Description</i>
RP07-337-000	Columbia Gulf Transmission	3/9/2007	Motion to Intervene	On March 1, 2007, Columbia Gulf Transmission Company ("Columbia Gulf") submitted revised tariff sheets to update their Transportation Retainage Adjustment Charge effective April 1, 2007
RP07-338-000	Transcontinental Gas Pipe Line	3/16/2007	Motion to intervene out of time	Transco filed to implement its Transmission Electric Power (TEP) rates, to be effective 4/1/2007.
RP07-340-000	Columbia Gas Transmission	3/19/2007	Protest - It is not supported by evidence establishing the operational need for such penalties and it is otherwise unduly discriminatory, unjust and unreasonable. Proposal fails to account for situations where customer imbalances help the system. The filing indicates the motices are more economic than operational. Filing will have disproportionate impact on shippers with small contract entitlements and who serve heat sensitive loads and whose demand for gas changes with the weather.	Columbia Gas proposed to implement Daily Delivery Point Scheduling penalties for Shippers who are 5% out of balance or 2% out of balance on critical notices.
RP07-344-000	Transcontinental Gas Pipe Line	3/19/2007	Motion to intervene	Transco filed revised tariff for the purpose of updating the lists of Buyers in Section 9 of Rate Schedule WSS and Section 8.2 of Rate Schedule WSS-Open Access ("WSS-OA") to reflect certain conversions to Rate Schedule WSS-OA service and/or the permanent release of that service to a new Replacement Buyer.
RP07-348-000	Columbia Gulf Transmission	3/28/2007	Motion to Intervene	Columbia Gulf is proposing to clarify how requisite credit assurance for non-firm services would be determined. Similar to the requirements for firm service, the credit assurance for non-firm services will also be based on the 3 highest months of usage.
RP07-351-000	Columbia Gas Transmission	3/28/2007	Motion to Intervene	Columbia Gas is proposing to incorporate the newly stated credit policies into the GTC of its Tariff where creditworthiness and related issues are currently addressed.

EXHIBIT__(KPM-2)

Firm Design Day Requirements Excluding Special Firm Transportation Contracts

	<u>FY 2006</u>	<u>FY 2007</u>	<u>FY 2008</u>	<u>FY 2009</u>	<u>FY 2010</u>	<u>FY 2011</u>	<u>FY 2012</u>	<u>FY 2013</u>
North Carolina - West								
Customer growth %		2.31200%	2.31200%	2.31200%	2.31200%	2.31200%	2.31200%	2.31200%
Total Firm Usage	805,441	824,066	843,122	862,618	882,565	902,973	923,853	945,216
5% Reserve Margin	<u>40,272</u>	<u>41,203</u>	<u>42,156</u>	<u>43,131</u>	<u>44,128</u>	<u>45,149</u>	<u>46,193</u>	<u>47,261</u>
Total Firm w/ Reserve	<u>845,713</u>	<u>865,269</u>	<u>885,278</u>	<u>905,749</u>	<u>926,693</u>	<u>948,122</u>	<u>970,046</u>	<u>992,477</u>
North Carolina - East								
Customer growth %		2.00100%	2.00100%	2.00100%	2.00100%	2.00100%	2.00100%	2.00100%
Total Firm Usage	282,117	287,762	293,520	299,393	305,383	311,493	317,725	324,082
5% Reserve Margin	<u>14,106</u>	<u>14,388</u>	<u>14,676</u>	<u>14,970</u>	<u>15,269</u>	<u>15,575</u>	<u>15,886</u>	<u>16,204</u>
Net Firm w/ Reserve	<u>296,223</u>	<u>302,150</u>	<u>308,196</u>	<u>314,363</u>	<u>320,652</u>	<u>327,068</u>	<u>333,611</u>	<u>340,286</u>
South Carolina								
Customer growth %		1.14800%	1.14800%	1.14800%	1.14800%	1.14800%	1.14800%	1.14800%
Total Firm Usage	178,062	180,106	182,174	184,265	186,380	188,520	190,684	192,873
5% Reserve Margin	<u>8,903</u>	<u>9,005</u>	<u>9,109</u>	<u>9,213</u>	<u>9,319</u>	<u>9,426</u>	<u>9,534</u>	<u>9,644</u>
Total Firm w/ Reserve	<u>186,965</u>	<u>189,111</u>	<u>191,283</u>	<u>193,478</u>	<u>195,699</u>	<u>197,946</u>	<u>200,218</u>	<u>202,517</u>
Total Carolinas								
Customer growth %		2.08000%	2.08000%	2.08000%	2.08000%	2.09000%	2.09000%	2.09000%
Total Firm Usage	1,265,620	1,291,934	1,318,816	1,346,276	1,374,328	1,402,986	1,432,262	1,462,171
5% Reserve Margin	<u>63,281</u>	<u>64,597</u>	<u>65,941</u>	<u>67,314</u>	<u>68,716</u>	<u>70,149</u>	<u>71,613</u>	<u>73,109</u>
Net Firm w/ Reserve	<u>1,328,901</u>	<u>1,356,531</u>	<u>1,384,757</u>	<u>1,413,590</u>	<u>1,443,044</u>	<u>1,473,135</u>	<u>1,503,875</u>	<u>1,535,280</u>

Firm Design Day Requirements Excluding Special Firm Transportation Contracts

	<u>FY 2007</u>	<u>FY 2008</u>	<u>FY 2009</u>	<u>FY 2010</u>	<u>FY 2011</u>	<u>FY 2012</u>	<u>FY 2013</u>	<u>FY 2014</u>	<u>FY 2015</u>
North Carolina - West		2.24000%							
Res. Customer Growth %	3.35000%	3.10000%	3.10000%	3.10000%	3.10000%	3.10000%	3.10000%	3.10000%	3.10000%
Comm. Customer Growth %	1.68000%	1.09000%	1.09000%	1.09000%	1.09000%	1.09000%	1.09000%	1.09000%	1.09000%
Total Residential Usage	495,242	510,595	526,423	542,742	559,567	576,914	594,798	613,237	632,247
Total Commercial Usage	282,631	285,712	288,826	291,974	295,157	298,374	301,626	304,914	308,238
Total Firm Industrial Usage	<u>46,301</u>	<u>46,301</u>	<u>46,301</u>	<u>46,301</u>	<u>46,301</u>	<u>46,301</u>	<u>46,301</u>	<u>46,301</u>	<u>46,301</u>
Total Firm Usage	824,174	842,608	861,550	881,017	901,025	921,589	942,725	964,452	986,786
5% Reserve Margin	<u>24,762</u>	<u>25,530</u>	<u>26,321</u>	<u>27,137</u>	<u>27,978</u>	<u>28,846</u>	<u>29,740</u>	<u>30,662</u>	<u>31,612</u>
Total Firm w/ Reserve	<u>848,936</u>	<u>868,138</u>	<u>887,871</u>	<u>908,154</u>	<u>929,003</u>	<u>950,435</u>	<u>972,465</u>	<u>995,114</u>	<u>1,018,398</u>
North Carolina - East									
Res. Customer Growth %	0.71000%	3.10000%	3.10000%	3.10000%	3.10000%	3.10000%	3.10000%	3.10000%	3.10000%
Comm. Customer Growth %	0.34000%	1.09000%	1.09000%	1.09000%	1.09000%	1.09000%	1.09000%	1.09000%	1.09000%
Total Residential Usage	143,881	148,341	152,940	157,681	162,569	167,609	172,805	178,162	183,685
Total Commercial Usage	117,288	118,566	119,858	121,164	122,485	123,820	125,170	126,534	127,913
Total Firm Industrial Usage	<u>45,451</u>	<u>45,451</u>	<u>45,451</u>	<u>45,451</u>	<u>45,451</u>	<u>45,451</u>	<u>45,451</u>	<u>45,451</u>	<u>45,451</u>
Total Firm Usage	306,620	312,358	318,249	324,296	330,505	336,880	343,426	350,147	357,049
5% Reserve Margin	<u>15,331</u>	<u>15,618</u>	<u>15,912</u>	<u>16,215</u>	<u>16,525</u>	<u>16,844</u>	<u>17,171</u>	<u>17,507</u>	<u>17,852</u>
Net Firm w/ Reserve	<u>321,951</u>	<u>327,976</u>	<u>334,161</u>	<u>340,511</u>	<u>347,030</u>	<u>353,724</u>	<u>360,597</u>	<u>367,654</u>	<u>374,901</u>
South Carolina									
Res. Customer Growth %	0.41000%	1.80000%	1.80000%	1.80000%	1.80000%	1.80000%	1.80000%	1.80000%	1.80000%
Comm. Customer Growth %	0.18000%	0.26000%	0.26000%	0.26000%	0.26000%	0.26000%	0.26000%	0.26000%	0.26000%
Total Residential Usage	104,951	106,840	108,763	110,721	112,714	114,743	116,808	118,911	121,051
Total Commercial Usage	62,438	62,600	62,763	62,926	63,090	63,254	63,418	63,583	63,748
Total Firm Industrial Usage	<u>7,643</u>	<u>7,643</u>	<u>7,643</u>	<u>7,643</u>	<u>7,643</u>	<u>7,643</u>	<u>7,643</u>	<u>7,643</u>	<u>7,643</u>
Total Firm Usage	175,032	177,083	179,169	181,290	183,447	185,640	187,869	190,137	192,442
5% Reserve Margin	<u>8,752</u>	<u>8,854</u>	<u>8,958</u>	<u>9,065</u>	<u>9,172</u>	<u>9,282</u>	<u>9,393</u>	<u>9,507</u>	<u>9,622</u>
Total Firm w/ Reserve	<u>183,784</u>	<u>185,937</u>	<u>188,127</u>	<u>190,355</u>	<u>192,619</u>	<u>194,922</u>	<u>197,262</u>	<u>199,644</u>	<u>202,064</u>
Total Carolinas		2.01000%	2.02000%	2.03000%	2.05000%	2.06000%	2.07000%	2.08000%	2.10000%
Res. Customer Growth %	2.41000%	2.92000%	2.92000%	2.92000%	2.92000%	2.92000%	2.93000%	2.93000%	2.93000%
Comm. Customer Growth %	1.13000%	0.98000%	0.98000%	0.98000%	0.98000%	0.98000%	0.98000%	0.98000%	0.98000%
Total Residential Usage	744,074	765,776	788,126	811,144	834,850	859,266	884,411	910,310	936,983
Total Commercial Usage	462,357	466,878	471,447	476,064	480,732	485,448	490,214	495,031	499,899
Total Firm Industrial Usage	<u>99,395</u>	<u>99,395</u>	<u>99,395</u>	<u>99,395</u>	<u>99,395</u>	<u>99,395</u>	<u>99,395</u>	<u>99,395</u>	<u>99,395</u>
Total Firm Usage	1,305,826	1,332,049	1,358,968	1,386,603	1,414,977	1,444,109	1,474,020	1,504,736	1,536,277
5% Reserve Margin	<u>65,291</u>	<u>66,602</u>	<u>67,948</u>	<u>69,330</u>	<u>70,749</u>	<u>72,205</u>	<u>73,701</u>	<u>75,237</u>	<u>76,814</u>
Total Firm w/ Reserve	<u>1,371,117</u>	<u>1,398,651</u>	<u>1,426,916</u>	<u>1,455,933</u>	<u>1,485,726</u>	<u>1,516,314</u>	<u>1,547,721</u>	<u>1,579,973</u>	<u>1,613,091</u>

Carolinas Demand & Supply Schedule
2.08% Carolinas Demand Growth Rate

(All Values in \$M)		102.08%									
DEMAND		2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13		
1	System Design Day Demand ¹	1,280,947	1,291,934	1,318,841	1,346,308	1,374,347	1,402,971	1,432,190	1,462,018		
2	Reserve Margin on Design Day Demand (5%)	63,947	64,597	65,942	67,315	68,717	70,149	71,610	73,101		
3	Subtotal Demand	1,323,894	1,356,531	1,384,783	1,413,624	1,443,065	1,473,119	1,503,800	1,535,119		
4	Less:										
5	Firm Transportation Without Standby	(44,000)	(44,000)								
6	Total Demand	1,279,894	1,312,531	1,384,783	1,413,624	1,443,065	1,473,119	1,503,800	1,535,119		
7	SUPPLY										
8	Firm Supplies										
9	Transco										
10	FT	376,016	376,016	376,016	376,016	376,016	376,016	376,016	376,016	376,016	
11	FT Incremental	6,440	6,440	6,440	6,440	6,440	6,440	6,440	6,440	6,440	
12	FT PS Conversion	6,314	6,314	6,314	6,314	6,314	6,314	6,314	6,314	6,314	
13	FT Southern Expansion	72,502	72,502	72,502	72,502	72,502	72,502	72,502	72,502	72,502	
14	FT SE '94/95/96	129,485	129,485	129,485	129,485	129,485	129,485	129,485	129,485	129,485	
15	FT-NT	13,232	13,232	13,232	13,232	13,232	13,232	13,232	13,232	13,232	
16	GSS Storage	77,475	77,475	77,475	77,475	77,475	77,475	77,475	77,475	77,475	
17	LNG (formerly LG-A)	8,643	8,643	8,643	8,643	8,643	8,643	8,643	8,643	8,643	
18	Sunbelt	41,400	41,400	41,400	41,400	41,400	41,400	41,400	41,400	41,400	
19	Transco Total	731,807	718,275	718,275	718,275	718,275	718,275	718,275	718,275	718,275	
20	Columbia Gas										
21	FTS	32,801	32,801	32,801	32,801	32,801	32,801	32,801	32,801	32,801	
22	NTS	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	
23	FSS/SST	86,368	86,368	86,368	86,368	86,368	86,368	86,368	86,368	86,368	
24	Columbia Gas Total	129,169	129,169	129,169	129,169	129,169	129,169	129,169	129,169	129,169	
25	Dominion										
26	GSS ²	13,000	13,000	13,000	13,000	13,000	13,000	13,000	13,000	13,000	
27	Hardy Storage										
28	HSS ³										
29	East Tennessee										
30	FT ⁴										
31	Firm Supplies Total	885,474	905,242	944,353	963,909	974,077	974,077	974,077	974,077	974,077	
32	Peaking Supplies										
33	LNG - local	188,000	188,000	188,000	188,000	188,000	188,000	188,000	188,000	188,000	
34	Pine Needle	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000	
35	Pine Needle	248,400	248,400	248,400	248,400	248,400	248,400	248,400	248,400	248,400	
36	Peaking Supplies Total	451,400	451,400	451,400	451,400	451,400	451,400	451,400	451,400	451,400	
37	Total Supply	1,336,874	1,356,642	1,395,753	1,415,309	1,425,477	1,425,477	1,425,477	1,425,477	1,425,477	
38	Surplus(Deficit)	56,880	44,111	10,970	1,685	(17,588)	(47,642)	(78,323)	(109,642)	(109,642)	

1/ Design Day Demand estimates for 2005-06 are as of August 2005. Design Day Demand estimates for 2006-07 and beyond are as of May 2006.
2/ Dominion GSS will be delivered to Piedmont's citygate using Dominion FT-GSS capacity. Transco FT-NT capacity, and Transco mainline IT Backhaul capacity.
3/ Hardy Storage quantities are delivered to Piedmont's citygate via TPS capacity on Columbia Gas and firm segmented backhaul capacity on Transco.
4/ East Tennessee will redeliver quantities taken off TETCO for 2005-06, and redeliver quantities taken off TETCO & Midwestern starting in 2006-2007.

Carolinas Demand & Supply Schedule
2.01% Carolinas Demand Growth Rate

(All Values in Dtd)												
DEMAND		Winter Period:		2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15
System Design Day Firm Sendout ¹				1,293,436	1,332,049	1,358,823	1,386,135	1,413,996	1,442,417	1,471,410	1,500,985	1,531,155
Reserve Margin on Design Day Demand (5%)				64,672	66,602	67,941	69,307	70,700	72,121	73,571	75,049	76,558
Subtotal Demand				1,358,108	1,398,651	1,426,764	1,455,442	1,484,696	1,514,538	1,544,981	1,576,034	1,607,713
Less:												
Firm Transportation Without Standby ²				(44,000)	(51,114)							
Total Firm Sales Demand				1,314,108	1,347,537	1,426,764	1,455,442	1,484,696	1,514,538	1,544,981	1,576,034	1,607,713
SUPPLY												
Firm Supplies		Days										
Transco	FT	365		376,016	376,016	376,016	376,016	376,016	376,016	376,016	376,016	376,016
Transco	FT - 1002268	365		6,440	6,440	6,440	6,440	6,440	6,440	6,440	6,440	6,440
Transco	FT SE '94/95/96	365		129,485	129,485	129,485	129,485	129,485	129,485	129,485	129,485	129,485
Transco	Sunbelt	365		41,400	41,400	41,400	41,400	41,400	41,400	41,400	41,400	41,400
Columbia Gas	FTS	365		32,801	32,801	32,801	32,801	32,801	32,801	32,801	32,801	32,801
Columbia Gas	NTS	365		10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000
East Tennessee	FT ³	365		44,798	44,798	44,798	44,798	44,798	44,798	44,798	44,798	44,798
Total Year Round				640,940	640,940	640,940	640,940	640,940	640,940	640,940	640,940	640,940
Transco	FT Southern Expansion	151		72,502	72,502	72,502	72,502	72,502	72,502	72,502	72,502	72,502
Transco	FT - 1004995	90		6,314	6,314	6,314	6,314	6,314	6,314	6,314	6,314	6,314
Total Winter Only				78,816	78,816	78,816	78,816	78,816	78,816	78,816	78,816	78,816
Hardy Storage	HSS ⁴	69			39,111	58,667	68,835	68,835	68,835	68,835	68,835	68,835
Dominion	GSS ⁵	60		13,000	13,225	13,225	13,225	13,225	13,225	13,225	13,225	13,225
Columbia Gas	FSS/SST	59		86,368	86,368	86,368	86,368	86,368	86,368	86,368	86,368	86,368
Transco	GSS Storage	55		77,475	77,475	77,475	77,475	77,475	77,475	77,475	77,475	77,475
Total Storage				176,843	216,179	235,735	245,903	245,903	245,903	245,903	245,903	245,903
Firm Supplies Total				896,599	935,935	955,491	965,659	965,659	965,659	965,659	965,659	965,659
Peaking Supplies												
Piedmont	LNG - local	10		188,000	188,000	188,000	188,000	188,000	188,000	188,000	188,000	188,000
Transco	Pine Needle	10		15,000								
Transco	Pine Needle	10		248,400	263,400	263,400	263,400	263,400	263,400	263,400	263,400	263,400
Transco	LNG (formerly LG-A)	5		8,643	8,643	8,643	8,643	8,643	8,643	8,643	8,643	8,643
Peaking Supplies Total				460,043	460,043	460,043	460,043	460,043	460,043	460,043	460,043	460,043
Total Supply				1,356,642	1,395,978	1,415,534	1,425,702	1,425,702	1,425,702	1,425,702	1,425,702	1,425,702
Surplus(Deficit)				42,534	48,441	(11,230)	(29,740)	(58,994)	(88,836)	(119,279)	(160,332)	(182,011)

1/ Design Day Demand estimates for 2006-07 are as of July 2006. Design Day Demand estimates for 2007-08 and beyond are as of June 2007.

2/ Firm Transportation Without Standby represents the quantity of gas estimated to be delivered by Piedmont's Rate Schedule 113 and 213 customers on design day. These customers can elect either transportation or sales service on an annual basis. Since the System Design Day Demand estimate on line 1 captures the demand of all firm large volume customers, an adjustment is made on line 5 for those customers who have elected firm transportation service (Rate Schedules 113 and 213) instead of firm sales services (Rate Schedules 103 and 203) for the coming winter.

3/ East Tennessee quantities are delivered to Cascade Creek via TPS service on Columbia Gas Transmission and then to Piedmont's citygate via an FT segmented backhaul on Transco.

4/ Hardy Storage quantities are delivered to Piedmont's citygate via TPS service on Columbia Gas Transmission to Transco Boswells Tavern and FT segmented backhaul on Transco.

5/ Dominion GSS will be delivered to Piedmont's citygate using Dominion FTGSS service, Transco FT service Leidy to Princeton Junction "Station 210" and a Transco mainline IT backhaul service to the Piedmont citygate.

EXHIBIT__(KPM-3)

North Carolina - West **Firm Base Load Requirements Excluding Special Firm Transportation Contracts**

Daily Degree Days 0.0

	Jan 2006	Current Forecast				
		Jan 2007	Jan 2008	Jan 2009	Jan 2010	Jan 2011
Customers						
Rate 21- Standard SU	193,951	199,770	205,763	211,936	218,294	224,843
Rate 01 - Value SU	197,167	203,082	209,174	215,449	221,912	228,569
Rate 01 - Value MU	18,962	19,531	20,117	20,721	21,343	21,983
Rate 21 - Standard MU	30,692	31,613	32,561	33,538	34,544	35,580
Rate 02 standard	35,467	35,893	36,324	36,760	37,201	37,647
Rate 32 Value	12,068	12,213	12,360	12,508	12,658	12,810
Rate 52 standard	87	88	89	90	91	92
Rate 62 Value	278	281	284	287	290	293
Rate 42 - MF	9	9	9	9	9	9
Rate 103	31	31	31	31	31	31
Rate 113	145	145	145	145	145	145
Total Customers	<u>488,681</u>	<u>502,480</u>	<u>516,681</u>	<u>531,298</u>	<u>546,342</u>	<u>561,826</u>

Firm Base Load Requirements Excluding Special Contracts (DTs)

Rate 21- Standard SU	4,482	4,617	4,755	4,898	5,045	5,196
Rate 01 - Value SU	13,098	13,491	13,895	14,312	14,742	15,184
Rate 01 - Value MU	1,085	1,118	1,151	1,186	1,221	1,258
Rate 21 - Standard MU	636	655	675	695	716	738
Rate 02 standard	2,207	2,233	2,260	2,287	2,315	2,342
Rate 32 Value	15,653	15,841	16,032	16,224	16,418	16,616
Rate 52 standard	207	209	211	214	216	219
Rate 62 Value	6,443	6,513	6,582	6,652	6,721	6,791
Rate 42 - MF	34	34	34	34	34	34
Rate 103	2,161	2,161	2,161	2,161	2,161	2,161
Rate 113	17,841	17,841	17,841	17,841	17,841	17,841
Co Use & Unacct	<u>830</u>	<u>841</u>	<u>853</u>	<u>865</u>	<u>877</u>	<u>889</u>
Requirements	64,677	65,554	66,450	67,369	68,307	69,269
Reserve Margin(5%)	<u>3,234</u>	<u>3,278</u>	<u>3,323</u>	<u>3,368</u>	<u>3,415</u>	<u>3,463</u>
Total Demand	<u>67,911</u>	<u>68,832</u>	<u>69,773</u>	<u>70,737</u>	<u>71,722</u>	<u>72,732</u>

12-Months Ending 3/06

Heat Factor	Base Factor
0.01405	0.02311
0.01683	0.06643
0.00845	0.05722
0.00736	0.02073
0.06790	0.06222
0.04937	1.29708
2.33730	2.37628
0.59890	23.17738
0.00000	3.78534
2.00208	69.70959
1.77876	123.04257
1.30%	

North Carolina - East
Firm Base Load Requirements Excluding Special Firm Transportation Contracts

Daily Degree Days 0.0

	Jan 2006	Current Forecast				
		Jan 2007	Jan 2008	Jan 2009	Jan 2010	Jan 2011
Customers						
Rate 21- Standard SU	66,678	68,678	70,738	72,860	75,046	77,297
Rate 01 - Value SU	47,998	49,438	50,921	52,449	54,022	55,643
Rate 01 - Value MU	391	403	415	427	440	453
Rate 21 - Standard MU	120	124	128	132	136	140
Rate 02 standard	10,599	10,726	10,855	10,985	11,117	11,250
Rate 32 Value	5,062	5,123	5,184	5,246	5,309	5,373
Rate 52 standard	21	21	21	21	21	21
Rate 62 Value	100	101	102	103	104	105
Rate 42 - MF	0	0	0	0	0	0
Rate 103	19	19	19	19	19	19
Rate 113	75	75	75	75	75	75
Ft. Bragg	1	1	1	1	1	1
Pilkington	1	1	1	1	1	1
Municipalities	4	4	4	4	4	4
Total Customers	<u>131,069</u>	<u>134,714</u>	<u>138,464</u>	<u>142,323</u>	<u>146,295</u>	<u>150,382</u>

Firm Base Load Requirements Including Military, Float Glass, & Municipalities (DTs)

Rate 21- Standard SU	1,828	1,883	1,940	1,998	2,058	2,119
Rate 01 - Value SU	2,111	2,175	2,240	2,307	2,376	2,448
Rate 01 - Value MU	13	13	14	14	14	15
Rate 21 - Standard MU	3	3	3	4	4	4
Rate 02 standard	2,119	2,145	2,170	2,196	2,223	2,249
Rate 32 Value	6,884	6,967	7,050	7,134	7,220	7,307
Rate 52 standard	172	172	172	172	172	172
Rate 62 Value	3,115	3,146	3,177	3,209	3,240	3,271
Rate 42 - MF	0	0	0	0	0	0
Rate 103	2,043	2,043	2,043	2,043	2,043	2,043
Rate 113	10,626	10,626	10,626	10,626	10,626	10,626
Ft. Bragg	2,631	2,631	2,631	2,631	2,631	2,631
Pilkington	8,532	8,532	8,532	8,532	8,532	8,532
Municipalities	7,731	7,731	7,731	7,731	7,731	7,731
Co Use & Unacct	<u>622</u>	<u>625</u>	<u>628</u>	<u>632</u>	<u>635</u>	<u>639</u>
Requirements	48,430	48,692	48,957	49,229	49,505	49,787
Reserve Margin(5%)	<u>2,422</u>	<u>2,435</u>	<u>2,448</u>	<u>2,461</u>	<u>2,475</u>	<u>2,489</u>
Total Demand	<u>50,852</u>	<u>51,127</u>	<u>51,405</u>	<u>51,690</u>	<u>51,980</u>	<u>52,276</u>

12-Months Ending 3/06
Heat Factor Base Factor

0.01425	0.02742
0.01791	0.04399
0.00373	0.03256
0.00588	0.02653
0.05585	0.19995
0.03477	1.35987
2.05585	8.19886
0.26642	31.15112
0.00000	0.00000
0.00000	107.50423
0.88976	141.67754
120.24338	2,631.01584
0.00000	8,532.10438
374.29167	1,932.86996
1.30%	

South Carolina
Firm Base Load Requirements Excluding Special Firm Transportation Contracts

Daily Degree Days 0.0

	Jan 2006	Current Forecast				
		Jan 2007	Jan 2008	Jan 2009	Jan 2010	Jan 2011
Customers						
Rate 21- Standard SU	57,002	58,712	60,473	62,287	64,156	66,081
Rate 01 - Value SU	44,533	45,869	47,245	48,662	50,122	51,626
Rate 01 - Value MU	5,167	5,322	5,482	5,646	5,815	5,989
Rate 21 - Standard MU	5,219	5,376	5,537	5,703	5,874	6,050
Rate 02 standard	10,280	10,403	10,528	10,654	10,782	10,911
Rate 32 Value	3,623	3,666	3,710	3,755	3,800	3,846
Rate 52 standard	23	23	23	23	23	23
Rate 62 Value	84	85	86	87	88	89
Rate 42 - MF	2	2	2	2	2	2
Rate 103	7	7	7	7	7	7
Rate 113	41	41	41	41	41	41
Total Customers	<u>125,981</u>	<u>129,506</u>	<u>133,134</u>	<u>136,867</u>	<u>140,710</u>	<u>144,665</u>

Firm Base Load Requirements Excluding Special Contracts (DTs)

Rate 21- Standard SU	1,069	1,101	1,134	1,169	1,204	1,240
Rate 01 - Value SU	2,850	2,935	3,023	3,114	3,207	3,304
Rate 01 - Value MU	316	326	335	345	356	366
Rate 21 - Standard MU	112	116	119	123	126	130
Rate 02 standard	602	609	617	624	632	639
Rate 32 Value	5,027	5,086	5,147	5,210	5,272	5,336
Rate 52 standard	123	123	123	123	123	123
Rate 62 Value	2,077	2,102	2,126	2,151	2,176	2,201
Rate 42 - MF	7	7	7	7	7	7
Rate 103	431	431	431	431	431	431
Rate 113	4,595	4,595	4,595	4,595	4,595	4,595
Co Use & Unacct	<u>224</u>	<u>227</u>	<u>230</u>	<u>233</u>	<u>236</u>	<u>239</u>
Requirements	17,433	17,658	17,887	18,125	18,365	18,611
Reserve Margin(5%)	<u>872</u>	<u>883</u>	<u>894</u>	<u>906</u>	<u>918</u>	<u>931</u>
Total Demand	<u>18,305</u>	<u>18,541</u>	<u>18,781</u>	<u>19,031</u>	<u>19,283</u>	<u>19,542</u>

12-Months Ending 3/06

Heat Factor	Base Factor
0.01344	0.01876
0.01658	0.06399
0.00736	0.06119
0.00732	0.02152
0.05576	0.05857
0.04104	1.38745
2.37982	5.36292
0.48258	24.72628
0.04319	3.31326
2.93350	61.62693
0.48396	112.06775
1.30%	

Total Carolinas (NC East, NC West, SC)
Firm Base Load Requirements Excluding Special Firm Transportation Contracts

Daily Degree Days 0.0

	Jan 2006	Current Forecast				
		Jan 2007	Jan 2008	Jan 2009	Jan 2010	Jan 2011
Customers						
Rate 21- Standard SU	317,631	327,160	336,974	347,083	357,496	368,221
Rate 01 - Value SU	289,698	298,389	307,340	316,560	326,056	335,838
Rate 01 - Value MU	24,520	25,256	26,014	26,794	27,598	28,425
Rate 21 - Standard MU	36,031	37,113	38,226	39,373	40,554	41,770
Rate 02 standard	56,346	57,022	57,707	58,399	59,100	59,808
Rate 32 Value	20,753	21,002	21,254	21,509	21,767	22,029
Rate 52 standard	131	132	133	134	135	136
Rate 62 Value	462	467	472	477	482	487
Rate 42 - MF	11	11	11	11	11	11
Rate 103	57	57	57	57	57	57
Rate 113	261	261	261	261	261	261
Ft. Bragg	1	1	1	1	1	1
Pilkington	1	1	1	1	1	1
Municipalities	4	4	4	4	4	4
Total Customers	<u>745,907</u>	<u>766,876</u>	<u>788,455</u>	<u>810,664</u>	<u>833,523</u>	<u>857,049</u>

Firm Base Load Requirements Excluding Special Contracts (DTs)						
Rate 21- Standard SU	7,379	7,601	7,829	8,065	8,307	8,555
Rate 01 - Value SU	18,059	18,601	19,158	19,733	20,325	20,936
Rate 01 - Value MU	1,414	1,457	1,500	1,545	1,591	1,639
Rate 21 - Standard MU	751	774	797	822	846	872
Rate 02 standard	4,928	4,987	5,047	5,107	5,170	5,230
Rate 32 Value	27,564	27,894	28,229	28,568	28,910	29,259
Rate 52 standard	502	504	506	509	511	514
Rate 62 Value	11,635	11,761	11,885	12,012	12,137	12,263
Rate 42 - MF	41	41	41	41	41	41
Rate 103	4,635	4,635	4,635	4,635	4,635	4,635
Rate 113	33,062	33,062	33,062	33,062	33,062	33,062
Ft. Bragg	2,631	2,631	2,631	2,631	2,631	2,631
Pilkington	8,532	8,532	8,532	8,532	8,532	8,532
Municipalities	7,731	7,731	7,731	7,731	7,731	7,731
Co Use & Unacct	1,676	1,693	1,711	1,730	1,748	1,767
Total Requirements	130,540	131,904	133,294	134,723	136,177	137,667
Reserve Margin(5%)	<u>6,527</u>	<u>6,595</u>	<u>6,665</u>	<u>6,736</u>	<u>6,809</u>	<u>6,883</u>
Total Demand	<u>137,067</u>	<u>138,499</u>	<u>139,959</u>	<u>141,459</u>	<u>142,986</u>	<u>144,550</u>

North Carolina - West

Firm Base Load Requirements Excluding Special Firm Transportation Contracts

Daily Degree Days 0.0

	Jan 2007	Current Forecast				
		Jan 2008	Jan 2009	Jan 2010	Jan 2011	Jan 2012
Customers						
Rate 21- Standard SU	204,848	211,198	217,745	224,495	231,454	238,629
Rate 01 - Value SU	198,748	204,909	211,261	217,810	224,562	231,523
Rate 01 - Value MU	19,562	20,168	20,793	21,438	22,103	22,788
Rate 21 - Standard MU	32,389	33,393	34,428	35,495	36,595	37,729
Rate 02 standard	35,518	35,905	36,296	36,692	37,092	37,496
Rate 32 Value	12,846	12,986	13,128	13,271	13,416	13,562
Rate 52 standard	74	75	76	77	78	79
Rate 62 Value	267	270	273	276	279	282
Rate 42 - MF	9	9	9	9	9	9
Rate 103	37	37	37	37	37	37
Rate 113	135	135	135	135	135	135
Total Customers	<u>504,261</u>	<u>518,913</u>	<u>534,009</u>	<u>549,563</u>	<u>565,588</u>	<u>582,097</u>

Firm Base Load Requirements Excluding Special Contracts (DTs)

Rate 21- Standard SU	3,513	3,622	3,734	3,850	3,969	4,092
Rate 01 - Value SU	12,378	12,762	13,157	13,565	13,986	14,419
Rate 01 - Value MU	1,046	1,079	1,112	1,147	1,182	1,219
Rate 21 - Standard MU	561	578	596	614	633	653
Rate 02 standard	1,597	1,614	1,632	1,649	1,667	1,685
Rate 32 Value	17,365	17,554	17,746	17,939	18,135	18,333
Rate 52 standard	266	270	273	277	280	284
Rate 62 Value	6,609	6,683	6,757	6,832	6,906	6,980
Rate 42 - MF	30	30	30	30	30	30
Rate 103	3,460	3,460	3,460	3,460	3,460	3,460
Rate 113	15,200	15,200	15,200	15,200	15,200	15,200
Co Use & Unacct	<u>806</u>	<u>817</u>	<u>828</u>	<u>839</u>	<u>851</u>	<u>863</u>
Requirements	62,831	63,669	64,525	65,402	66,299	67,218
Reserve Margin(5%)	<u>3,142</u>	<u>3,183</u>	<u>3,226</u>	<u>3,270</u>	<u>3,315</u>	<u>3,361</u>
Total Demand	<u>65,973</u>	<u>66,852</u>	<u>67,751</u>	<u>68,672</u>	<u>69,614</u>	<u>70,579</u>

12-Months Ending 3/07
Heat Factor Base Factor

0.01415	0.01715
0.01681	0.06228
0.00862	0.05348
0.00756	0.01731
0.06626	0.04495
0.04460	1.35176
2.35906	3.59485
0.58753	24.75272
0.00000	3.31294
2.39448	93.50627
2.03362	112.59526
1.30%	

North Carolina - East
Firm Base Load Requirements Excluding Special Firm Transportation Contracts

Daily Degree Days 0.0

	Jan 2007	Current Forecast				
		Jan 2008	Jan 2009	Jan 2010	Jan 2011	Jan 2012
Customers						
Rate 21- Standard SU	69,885	72,051	74,285	76,588	78,962	81,410
Rate 01 - Value SU	48,478	49,981	51,530	53,127	54,774	56,472
Rate 01 - Value MU	491	506	522	538	555	572
Rate 21 - Standard MU	323	333	343	354	365	376
Rate 02 standard	10,836	10,954	11,073	11,194	11,316	11,439
Rate 32 Value	5,065	5,120	5,176	5,232	5,289	5,347
Rate 52 standard	22	22	22	22	22	22
Rate 62 Value	110	111	112	113	114	115
Rate 42 - MF	0	0	0	0	0	0
Rate 103	13	13	13	13	13	13
Rate 113	88	88	88	88	88	88
Military	2	2	2	2	2	2
Float Glass	1	1	1	1	1	1
Municipalities	4	4	4	4	4	4
Total Customers	<u>135,318</u>	<u>139,186</u>	<u>143,171</u>	<u>147,276</u>	<u>151,505</u>	<u>155,861</u>

Firm Base Load Requirements Including Military, Float Glass, & Municipalities (DTs)

							12-Months Ending 3/07	
							Heat Factor	Base Factor
Rate 21- Standard SU	1,023	1,055	1,088	1,121	1,156	1,192	0.01386	0.01464
Rate 01 - Value SU	2,819	2,906	2,996	3,089	3,185	3,283	0.01623	0.05814
Rate 01 - Value MU	15	15	15	16	16	17	0.00522	0.02968
Rate 21 - Standard MU	6	6	7	7	7	7	0.00354	0.01949
Rate 02 standard	360	364	368	372	376	380	0.05571	0.03325
Rate 32 Value	7,546	7,628	7,711	7,794	7,879	7,966	0.02930	1.48975
Rate 52 standard	62	62	62	62	62	62	2.13885	2.83493
Rate 62 Value	2,838	2,864	2,890	2,916	2,942	2,967	0.44211	25.80311
Rate 42 - MF	0	0	0	0	0	0	0.00000	0.00000
Rate 103	549	549	549	549	549	549	1.87492	42.25488
Rate 113	9,451	9,451	9,451	9,451	9,451	9,451	0.98893	107.39792
Military	2,531	2,531	2,531	2,531	2,531	2,531	156.21704	1,265.25392
Float Glass	8,536	8,536	8,536	8,536	8,536	8,536	0.00000	8,535.99096
Municipalities	13,736	13,736	13,736	13,736	13,736	13,736	328.13947	3,434.06861
Co Use & Unacct	<u>643</u>	<u>646</u>	<u>649</u>	<u>652</u>	<u>656</u>	<u>659</u>	1.30%	
Requirements	50,115	50,349	50,589	50,832	51,082	51,336		
Reserve Margin(5%)	<u>2,506</u>	<u>2,517</u>	<u>2,529</u>	<u>2,542</u>	<u>2,554</u>	<u>2,567</u>		
Total Demand	<u>52,621</u>	<u>52,866</u>	<u>53,118</u>	<u>53,374</u>	<u>53,636</u>	<u>53,903</u>		

South Carolina
Firm Base Load Requirements Excluding Special Firm Transportation Contracts

Daily Degree Days 0.0

	Jan 2007	Current Forecast				
		Jan 2008	Jan 2009	Jan 2010	Jan 2011	Jan 2012
Customers						
Rate 21- Standard SU	58,672	59,728	60,803	61,897	63,011	64,145
Rate 01 - Value SU	44,810	45,617	46,438	47,274	48,125	48,991
Rate 01 - Value MU	5,086	5,178	5,271	5,366	5,463	5,561
Rate 21 - Standard MU	5,335	5,431	5,529	5,629	5,730	5,833
Rate 02 standard	10,084	10,110	10,136	10,162	10,188	10,214
Rate 32 Value	3,843	3,868	3,893	3,918	3,943	3,969
Rate 52 standard	19	19	19	19	19	19
Rate 62 Value	92	93	94	95	96	97
Rate 42 - MF	2	2	2	2	2	2
Rate 103	11	11	11	11	11	11
Rate 113	43	43	43	43	43	43
Total Customers	<u>127,997</u>	<u>130,100</u>	<u>132,239</u>	<u>134,416</u>	<u>136,631</u>	<u>138,885</u>

Firm Base Load Requirements Excluding Special Contracts (DTs)

Rate 21- Standard SU	935	951	969	986	1,004	1,022
Rate 01 - Value SU	2,698	2,746	2,796	2,846	2,897	2,949
Rate 01 - Value MU	306	312	317	323	329	335
Rate 21 - Standard MU	111	113	115	117	119	121
Rate 02 standard	467	468	469	470	472	473
Rate 32 Value	5,046	5,078	5,111	5,144	5,177	5,211
Rate 52 standard	25	25	25	25	25	25
Rate 62 Value	2,131	2,154	2,177	2,201	2,224	2,247
Rate 42 - MF	8	8	8	8	8	8
Rate 103	691	691	691	691	691	691
Rate 113	4,118	4,118	4,118	4,118	4,118	4,118
Co Use & Unacct	<u>215</u>	<u>217</u>	<u>218</u>	<u>220</u>	<u>222</u>	<u>224</u>
Requirements	16,751	16,881	17,014	17,149	17,286	17,424
Reserve Margin(5%)	<u>838</u>	<u>844</u>	<u>851</u>	<u>857</u>	<u>864</u>	<u>871</u>
Total Demand	<u>17,589</u>	<u>17,725</u>	<u>17,865</u>	<u>18,006</u>	<u>18,150</u>	<u>18,295</u>

12-Months Ending 3/07	
Heat Factor	Base Factor
0.01472	0.01593
0.01783	0.06020
0.00809	0.06019
0.00806	0.02075
0.05850	0.04629
0.04611	1.31293
3.04496	1.33521
0.40790	23.16476
0.02827	4.20285
1.31773	62.78262
0.81517	95.75606
1.30%	

Total Carolinas (NC East, NC West, SC)
Firm Base Load Requirements Excluding Special Firm Transportation Contracts

Daily Degree Days

0.0

	Jan 2007	Current Forecast				
		Jan 2008	Jan 2009	Jan 2010	Jan 2011	Jan 2012
Customers						
Rate 21- Standard SU	333,405	342,977	352,833	362,980	373,427	384,184
Rate 01 - Value SU	292,036	300,507	309,229	318,211	327,461	336,986
Rate 01 - Value MU	25,139	25,852	26,586	27,342	28,121	28,921
Rate 21 - Standard MU	38,047	39,157	40,300	41,478	42,690	43,938
Rate 02 standard	56,438	56,969	57,505	58,048	58,596	59,149
Rate 32 Value	21,754	21,974	22,197	22,421	22,648	22,878
Rate 52 standard	115	116	117	118	119	120
Rate 62 Value	469	474	479	484	489	494
Rate 42 - MF	11	11	11	11	11	11
Rate 103	61	61	61	61	61	61
Rate 113	266	266	266	266	266	266
Military	2	2	2	2	2	2
Float Glass	1	1	1	1	1	1
Municipalities	4	4	4	4	4	4
Total Customers	<u>767,748</u>	<u>788,371</u>	<u>809,591</u>	<u>831,427</u>	<u>853,896</u>	<u>877,015</u>

Firm Base Load Requirements Excluding Special Contracts (DTs)

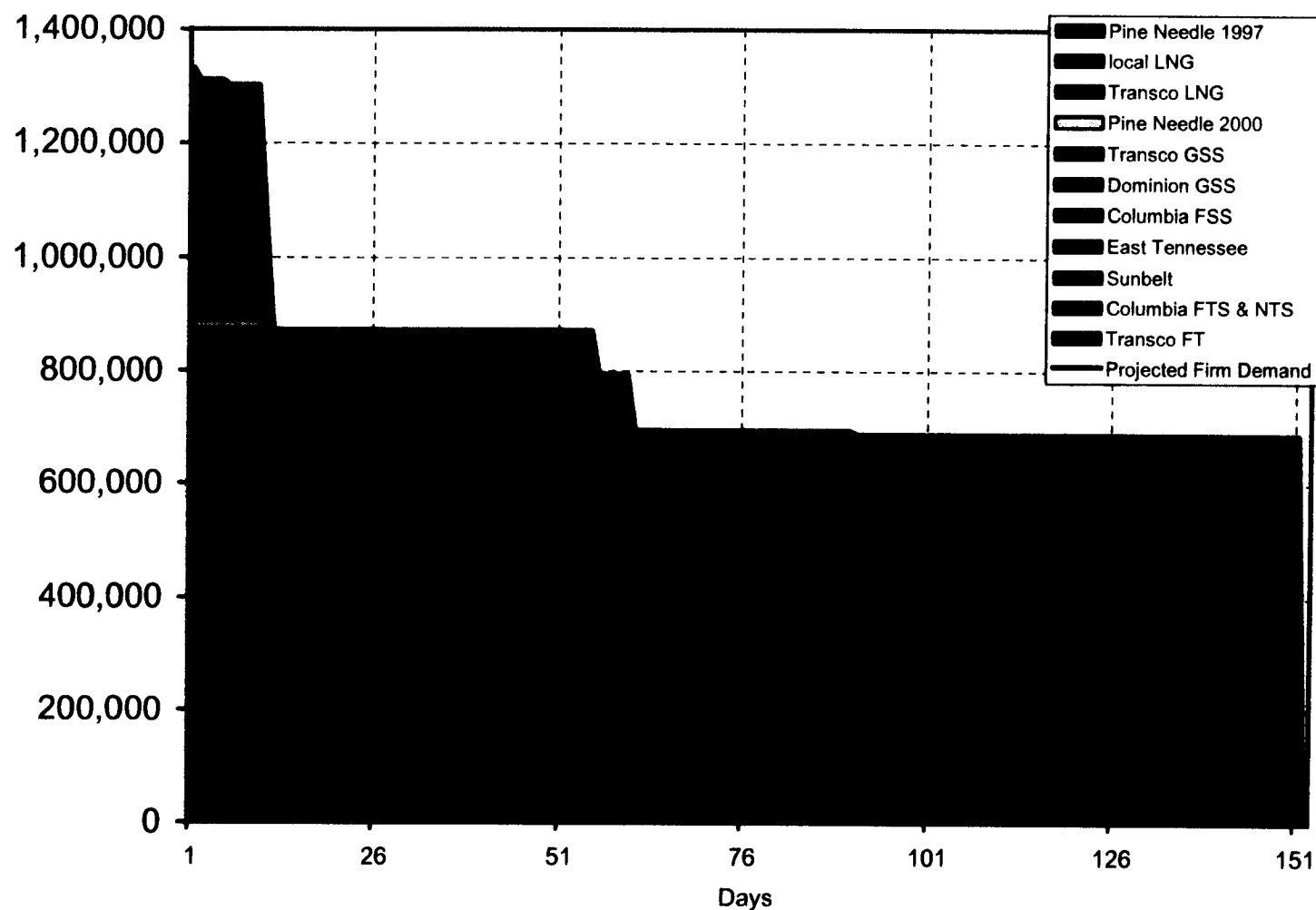
Rate 21- Standard SU	5,471	5,628	5,791	5,957	6,129	6,306
Rate 01 - Value SU	17,895	18,414	18,949	19,500	20,068	20,651
Rate 01 - Value MU	1,367	1,406	1,444	1,486	1,527	1,571
Rate 21 - Standard MU	678	697	718	738	759	781
Rate 02 standard	2,424	2,446	2,469	2,491	2,515	2,538
Rate 32 Value	29,957	30,260	30,568	30,877	31,191	31,510
Rate 52 standard	353	357	360	364	367	371
Rate 62 Value	11,578	11,701	11,824	11,949	12,072	12,194
Rate 42 - MF	38	38	38	38	38	38
Rate 103	4,700	4,700	4,700	4,700	4,700	4,700
Rate 113	28,769	28,769	28,769	28,769	28,769	28,769
Military	2,531	2,531	2,531	2,531	2,531	2,531
Float Glass	8,536	8,536	8,536	8,536	8,536	8,536
Municipalities	13,736	13,736	13,736	13,736	13,736	13,736
Co Use & Unacct	1,664	1,680	1,695	1,711	1,729	1,746
Total Requirements	129,697	130,899	132,128	133,383	134,667	135,978
Reserve Margin(5%)	<u>6,485</u>	<u>6,545</u>	<u>6,606</u>	<u>6,669</u>	<u>6,733</u>	<u>6,799</u>
Total Demand	<u>136,182</u>	<u>137,444</u>	<u>138,734</u>	<u>140,052</u>	<u>141,400</u>	<u>142,777</u>

EXHIBIT__(KPM-4)

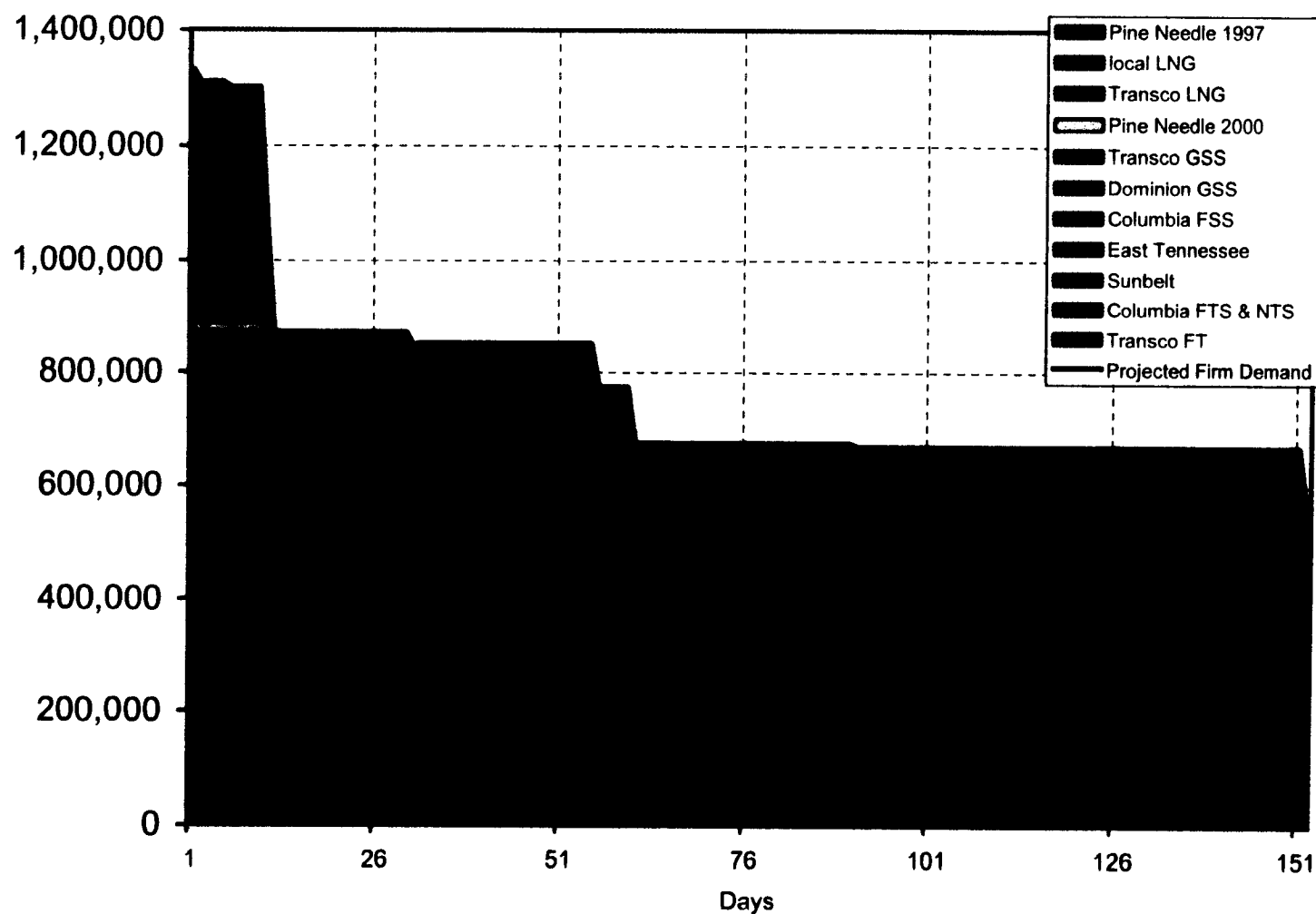
2006-07 Load Duration Curve

Design Winter Season - Total Carolinas

Firm Capacity and Forecasted Demand



2006-07 Load Duration Curve
Design Winter Season - Total Carolinas
Firm Capacity and Actual Firm Sendout

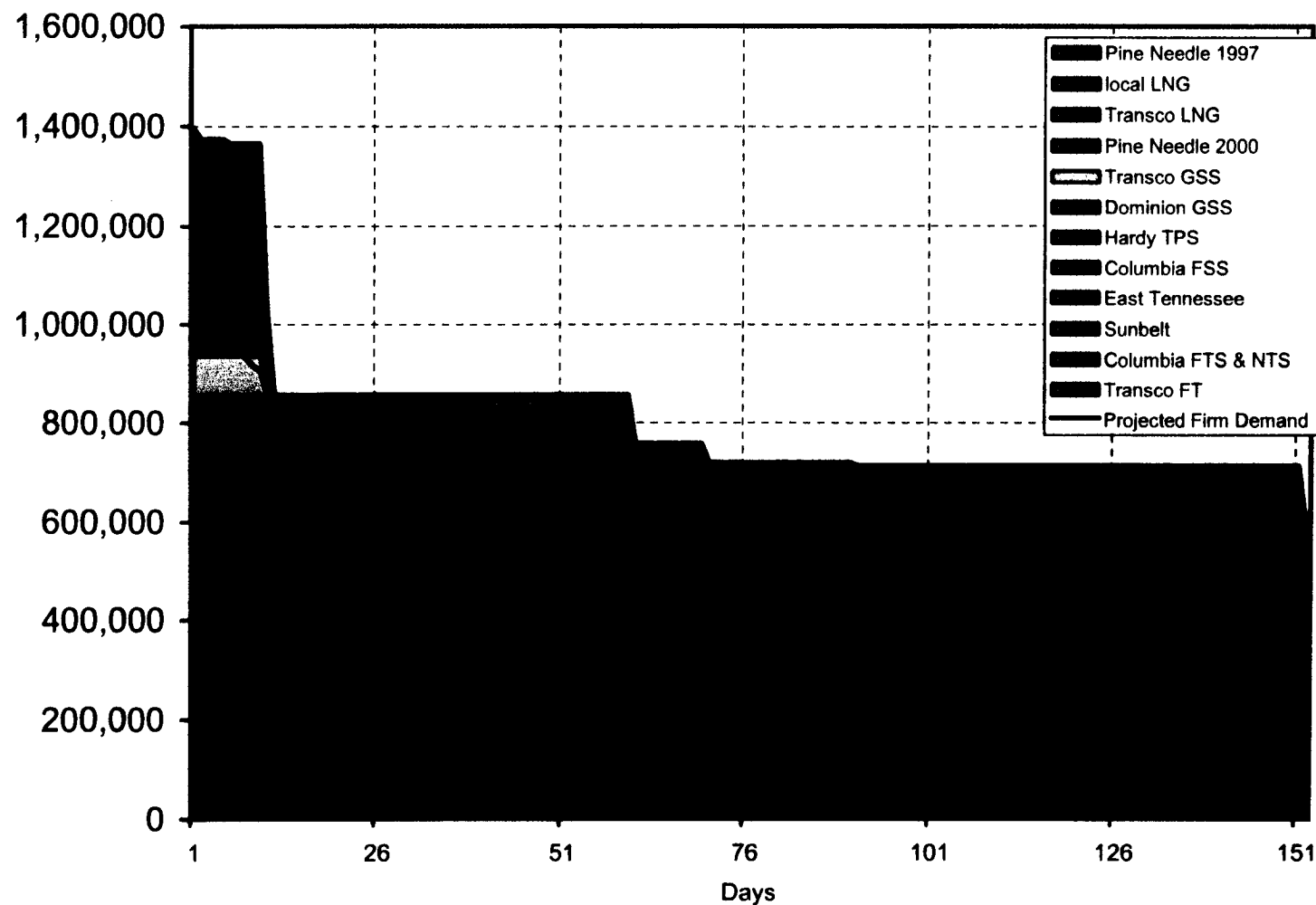


EXHIBIT__(KPM-5)

2007-08 Load Duration Curve

Design Winter Season - Total Carolinas

Firm Capacity and Forecasted Demand



CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached *Direct Testimony and Exhibits of Keith P. Maust on Behalf of Piedmont Natural Gas Company, Inc.* is being served this date via UPS Overnight upon:

Jeffrey M. Nelson
Office of Regulatory Staff
1441 Main Street
Suite 300
Columbia, South Carolina 29201
(5 copies)

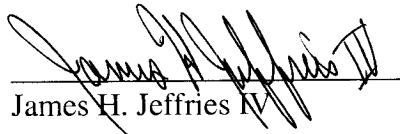
And that a copy of the attached *Direct Testimony and Exhibits of Keith P. Maust on Behalf of Piedmont Natural Gas Company, Inc.* is being served this date via U.S. Mail upon:

Jane Lewis-Raymond
Vice President & General Counsel
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, North Carolina 28233

David Carpenter
Managing Director Regulatory Affairs
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, North Carolina 28233

RECEIVED
2007 OCT 12 AM 10:05
SC PUBLIC SERVICE
COMMISSION

This the 11th day of October, 2007.


James H. Jeffries IV